

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE  
FOR THE MIDDLE DISTRICT  
NASHVILLE DIVISION

-----  
JANE DOE, )  
 )  
Plaintiff, )  
 )  
v. ) No. 3:20-CV-01023  
 ) Jury Demand  
THE METROPOLITAN ) Judge Trauger  
GOVERNMENT OF NASHVILLE AND ) Magistrate Judge  
DAVIDSON COUNTY, TENNESSEE ) Holmes  
AND DR. ADRIENNE BATTLE ) Lead Case  
 )  
Defendants. )  
-----

DR. LILY MORENO LEFFLER, )  
 )  
Plaintiff, )  
v. )  
 )  
THE METROPOLITAN )  
GOVERNMENT OF NASHVILLE AND )  
DAVIDSON COUNTY, TENNESSEE, )  
AND DR. ADRIENNE BATTLE )  
 )  
Defendants. )  
-----

DR. JAMES BAILEY, )  
DR. PIPPA MERIWETHER, and )  
DR. DAMON CATHEY, )  
 )  
Plaintiffs, )  
v. )  
 )

METROPOLITAN GOVERNMENT )  
OF NASHVILLE AND DAVIDSON )  
COUNTY, TENNESSEE and )  
DR. ADRIENNE BATTLE, )  
 )  
Defendants. )  
-----

The Deposition of: HENRY PATRICK RYLE CLAY  
March 29, 2022

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1           The deposition of HENRY PATRICK RYLE CLAY  
2 was taken by counsel for the Plaintiffs, by notice,  
3 at the law offices of Metro Legal, Nashville,  
4 Tennessee, on March 29th, 2022, pursuant to the  
5 provisions of the Federal Rules of Civil Procedure.

6           All formalities as to notice, caption,  
7 certificate, reading and signing of the deposition  
8 are waived. All objections, except as to the form of  
9 the questions, are reserved to the hearing.

10 -----  
11  
12 APPEARANCES:

13 For the Plaintiffs:

14       Dr. James Bailey  
15       Dr. Lily Leffler  
16       Dr. Pippa Meriwether  
17       Jane Doe

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INDEX

Examination by Ms. Steiner . . . . .	Page 5
Examination by Ms. Harbison . . . . .	Page 200
Redirect Examination by Ms. Steiner . . . . .	Page 218

EXHIBITS

No. 1 Operating Budget 2020-2021 . . . . .	Page 50
No. 2 Operating Budget 2019-2020 . . . . .	Page 52
No. 3 School board agenda 5/26/20 . . . . .	Page 71
No. 4 MG 001350 document . . . . .	Page 72
No. 5 MNPS Organizational Structure MG 001057 . . . . .	Page 83
No. 6 Ashford Hughes application . . . . .	Page 131
No. 7 Record Check Search . . . . .	Page 133
No. 8 LinkedIn - Ashford Hughes . . . . .	Page 141
No. 9 Ashford Hughes resumé . . . . .	Page 142
No. 10 MNPS Organizational Structure . . . . .	Page 169
No. 11 LinkedIn Profile (Collective) . . . . .	Page 202

1                   HENRY PATRICK RYLE CLAY,  
2   called as a witness and, having been first duly  
3   sworn, was deposed as follows:

4   EXAMINATION BY MS. STEINER:

5           Q.    Would you please state your full name for  
6   the record?

7           A.    Sure.  It's Henry Patrick Ryle Clay,  
8   R-Y-L-E.

9           Q.    That's good, because every time I refer to  
10   you in this case, I call you Henry Clay.

11          A.    Well, he was my great, great, great,  
12   whatever uncle.

13          Q.    Are you serious?  Off the record for a  
14   second.

15                   (Off-the-record discussion held.)

16   BY MS. STEINER:

17          Q.    Okay.  Is it Mr. Clay, Dr. Clay?

18          A.    It's mister.

19          Q.    Mr. Clay.  Okay.  Now, I do not have your  
20   CV, and I was looking for it online and couldn't  
21   find it --

22          A.    Okay.

23          Q.    So I'm going to ask you --

24          A.    I'm on LinkedIn.

25          Q.    Are you on LinkedIn?

1 A. Yes.

2 Q. Okay. I could not find that. Tell me a  
3 little bit about your background.

4 A. Yeah. Be glad to. So from Georgia, I  
5 went to undergrad and graduate school at the  
6 University of Georgia. I have undergrad degrees in  
7 social work and international affairs, graduate  
8 degrees in social work and public administration.  
9 Came up to Nashville in 2009 to follow my wife, and  
10 worked for the Comptroller of the Treasury, and then  
11 went over to the State Department of Education when  
12 they won Race to the Top to help on education issues  
13 in 2011.

14 And then in 2012, I came to run Race at  
15 the Top at Metro Nashville Public Schools. In 2013,  
16 switched over to be head of government relations for  
17 the school district for about five years, and then  
18 went to go run a statewide nonprofit called  
19 Communities in Schools of Tennessee for two years.  
20 And then returned to MNPS in 2019, July of 2019, as  
21 Dr. Battle's chief of staff, and I've been in that  
22 position since then.

23 Q. And Dr. Battle asked you to return to  
24 Metro -- (Court Reporter asks for clarification.)  
25 Was that a position that you applied for or was that

1 a position that Dr. Battle put you in?

2 A. I submitted an application, but it was an  
3 appointment.

4 Q. Meaning that you did not have to -- does  
5 an appointment mean that you don't have to compete  
6 against other applicants that --

7 A. It --

8 Q. -- are actually appointed?

9 A. It depends on the situation. In my case,  
10 I'm not sure she considered other applicants, but  
11 she interviewed me and talked and then appointed me  
12 to the position.

13 Q. Did she tell you she really wasn't  
14 considering any other applicants?

15 A. She did not.

16 Q. She did?

17 A. She did not.

18 Q. Then what makes you think that?

19 A. I would say I don't know if she considered  
20 other applicants.

21 Q. Did you know her before July of 2019?

22 A. I had met her before, but didn't know her  
23 well. She and I had -- she was principal when I was  
24 first at the district, and then she, I believe, was  
25 over priority schools when I was in government

1 relations, but we didn't know each other well.

2 Q. How did you come about to apply for the  
3 job as chief of staff?

4 A. I talked with her about some of her  
5 vision, and we saw there was a lot of alignment  
6 between what she hoped to do for the district, and I  
7 felt like I had some skills to be able to help out.  
8 I guess that would be it.

9 Q. Was that in the interview?

10 A. Yeah.

11 Q. My question is a little different. What  
12 caused you to even apply for the job of chief of  
13 staff, did someone contact you?

14 A. Yeah. She contacted me.

15 Q. So Dr. Battle contacted you and asked you  
16 to apply for the job?

17 A. That's right.

18 Q. So that's why you were pretty sure you had  
19 the job, correct?

20 A. I wouldn't say that. I guess what I'm  
21 trying to say is, I don't know if she considered  
22 other people, I don't know -- I don't know what her  
23 deliberation process was at the time, but I felt  
24 like I had something to add and she ended up hiring  
25 me.



1 Q. Have you ever testified before?

2 A. I have.

3 Q. How many times?

4 A. Once.

5 Q. What type of case?

6 A. It was a deposition for the adequacy of  
7 funding case.

8 Q. The one that's going on in chancery court  
9 right now?

10 A. I'm not sure of the exact legal position  
11 of it, but I believe --

12 Q. Recently?

13 A. Uh-huh.

14 Q. Now, there's only one thing I'm going to  
15 stop you at, and that is when you go uh-huh, it  
16 makes a terrible record, and so you need to say yes  
17 or no, and I'll stop you every time you do that,  
18 because it's common, everyone does that.

19 And as you know, my name is Ann Steiner,  
20 and I represent four of the plaintiffs in this  
21 lawsuit, and Jesse Harbison represents Dr. Cathey.  
22 I'm going to ask you a whole bunch of questions  
23 today, if you don't understand anything I've asked  
24 you, tell me to rephrase it, because I'm not that  
25 familiar with your job --

1 A. Yeah.

2 Q. -- and so I may be confusing on some of my  
3 questions, and I'll be happy to rephrase it until we  
4 are on the same page about what the question is.

5 If you want to go back and change your  
6 answer later in the deposition, if you think of  
7 something that's different, or if you think  
8 something is inaccurate, please feel free to do so;  
9 is that okay?

10 A. Yes.

11 Q. Thank you. Now, when you handled federal  
12 contracts or governmental contracts, did that  
13 include the budget?

14 A. To clarify, I did not handle government  
15 contracts. I was the government relations director.  
16 Yes, it did involve the budget.

17 Q. That's the budget from Metro Schools?

18 A. Correct.

19 Q. And would you deal with the Metro  
20 government?

21 A. Yes.

22 Q. Okay. And so then in the budget process,  
23 it's -- tell me how that works between what Metro  
24 Schools is doing with regard to the budget and  
25 getting it approved by Metro Government, how does

1 that coordinate?

2 A. Would you rephrase? Do you want me to go  
3 through the budget process, what do you mean?

4 Q. For instance, supposing if you had a  
5 budget of 914 million, is it -- do you pull up the  
6 budget from the previous year and then figure out  
7 what you want, and then you go back and forth to  
8 Metro to tell them, this is what we think we're  
9 going to put in our budget, how does that work?

10 A. The way that we've identified, it's  
11 happened various ways over the years. The way that  
12 we handle it is we set objectives that we want  
13 students to achieve, the strategies that we feel  
14 like will achieve those objectives, and then the  
15 resources behind those new investments that would be  
16 required, kind of an aspirational budget.

17 We also go back and look at the prior  
18 year's budget and determine in there whether there  
19 are changes that need to be made in there, depending  
20 on the situation of the year that we are in.

21 Q. Okay. And when you say "aspirational  
22 budget," what does that mean to you?

23 A. That means that if money were not a  
24 limiting factor, what are all of the strategies that  
25 would be necessary for achievement.

1 Q. And so then do you send that figure of  
2 what the aspirational budget is to Metro?

3 A. Yes. What we do is, we present that  
4 information to the public, hold a public hearing,  
5 public comment periods, then the school board  
6 ultimately approves that direction. That's public  
7 information. The mayor goes through his or her  
8 deliberation, and then they determine what the total  
9 amount of funding or new finding would be.

10 Q. My question is a little different, though,  
11 because it seems like to me, if you're putting in  
12 the aspirational budget of everything that you could  
13 possibly want to make the schools run properly,  
14 correct?

15 A. We seek -- it's not literally every single  
16 thing, but it is -- but it is a wide variety of  
17 things that would be as aspirational would feel  
18 could be realistic.

19 Q. And do you before it goes in front of the  
20 school board, did your office or did anyone with  
21 Metro Schools have any contact with the Metro  
22 Government to see whether or not this aspirational  
23 budget -- to discuss it?

24 A. We're in constant contact with both the  
25 mayor finance office, metro finance office, and

1 metro counsel trying to convey; A, what we're doing  
2 with our -- the investments that they have given,  
3 and then, B, advocating for increased investment to  
4 help serve our students to move forward past that.

5 Q. Is this done typically by e-mail?

6 A. I would not -- it may occasionally --  
7 e-mail exchanges may occur, but I think more  
8 typically it's through meetings or both public  
9 meetings with metro council and then one-on-one  
10 meetings with the mayor's administration.

11 Q. And do you have any documents that you  
12 present in these meetings that show the aspirational  
13 budget?

14 A. Yes.

15 Q. Okay. And that's a yearly thing, correct,  
16 every year?

17 A. That is correct.

18 Q. Okay. And is it correct, too, that you  
19 don't necessarily get your aspirational budget  
20 approved?

21 A. Yes.

22 Q. Okay. And from my -- it seems like from  
23 looking at everything, that it's fairly common for  
24 the aspirational budget not to be approved in that  
25 you're given something under that?

1 A. That's accurate.

2 Q. Okay. And who does your job dealing with  
3 government currently?

4 A. That position is vacant. (Court Reporter  
5 asks for clarification.)

6 Q. In the spring of 2020, who handled your  
7 job?

8 A. Which job, the chief of staff job?

9 Q. No. The governmental relations?

10 A. Mark North.

11 Q. Okay. And he reports to you?

12 A. He did at the time.

13 Q. And does he still work for Metro?

14 A. He does.

15 Q. What is his position now?

16 A. High school athletics director.

17 Q. How long has his position been vacant?

18 A. I believe since October of 2021.

19 Q. So did he hold that position from the  
20 2019/2020 school year until October of 2021?

21 A. Yes.

22 Q. Okay. Do you know why he left?

23 A. We asked him -- he has expertise in  
24 athletics. That's a core vision for previous  
25 achievement and he had value to add to that.

1 Q. Are you looking for someone to fill the  
2 job of government relations?

3 A. I am.

4 Q. Have you been interviewing since October  
5 of 2021?

6 A. No, I have not. No.

7 Q. So is it -- if you haven't interviewed  
8 anyone, have you gotten any applications?

9 A. It's not been posted yet.

10 Q. Okay. So you're not looking for anyone  
11 yet?

12 MR. FOX: Objection to the form.

13 THE WITNESS: So would you rephrase the  
14 question?

15 BY MS. STEINER:

16 Q. Are you actively looking for someone to  
17 take over Mark North's position in government  
18 relations?

19 A. If your question is, have I posted the  
20 position, no, I have not. Have I been thinking  
21 about potential pools of applicants, yes, I have.

22 Q. And --

23 A. For when we post.

24 Q. When you're thinking of the potential  
25 pools, are you thinking of particular individuals?

1           A.     More qualifications of what I would want  
2 to have that might be demonstrated through an  
3 individual person.

4           Q.     Have you thought of any individual person  
5 that you can name filling that position?

6           A.     Yes.

7           Q.     Who?

8           A.     Evan Freeman.

9           Q.     Have you told Mr. Freeman that?

10          A.     I talked to him to see if ever he would be  
11 interested in applying for the position.

12          Q.     Does he work for Metro Schools currently?

13          A.     No.

14          Q.     Have you talked to Dr. Battle about  
15 contacting Evan Freeman about that job?

16          A.     Yes.

17          Q.     And did she say, fine --

18          A.     Wait. I'm sorry. I talked to Dr. Battle  
19 about what?

20          Q.     About contacting Evan Freeman about the  
21 governmental contract or governmental relations job?

22          A.     There -- I haven't posted a position. I  
23 did talk with her about -- about whether -- about  
24 reaching out to see if someone of like his  
25 background could be interested in the job and



1 whether that was the type of person we would want to  
2 apply for the job that we post in the future.

3 Q. Did she say, yes, go on and contact him?

4 MR. FOX: Objection to the form.

5 BY MS. STEINER:

6 Q. What was her response back?

7 A. I'm trying to recall. I wouldn't be able  
8 to recall her exact response.

9 Q. Well, after you talked to her, had you  
10 contacted him before you contacted her?

11 A. I don't remember the order.

12 Q. But you have talked to Mr. Freeman to see  
13 whether or not he's interested in the job?

14 A. I talked to Mr. Freeman to see -- he lives  
15 in Chattanooga, to see if someone with a federal  
16 background could be -- whether we wanted someone  
17 with more of a federal background or whether we  
18 wanted somebody with more of a state background.

19 Q. And where does he work now?

20 A. I believe that he works for -- I can't  
21 remember the precise name, but the equivalent of the  
22 electric service in Chattanooga.

23 Q. And what does he do for the electric  
24 service?

25 A. I don't know precisely. I believe it's a

1 governmental relations role.

2 Q. So how did you come about to even know  
3 Mr. Freeman to contact him about this job?

4 A. He used to work for Senator Alexander, and  
5 I knew him from that role.

6 Q. Did you work for Senator Alexander?

7 A. No.

8 Q. So he had a political job in Alexander's  
9 office?

10 A. I don't know how it would be classified,  
11 whether it was political. His job was to work with  
12 areas of the state of Tennessee as a representative  
13 for Senator Alexander.

14 Q. What was his -- when was the last time he  
15 worked for Senator Alexander?

16 A. I wouldn't know precisely. Maybe a couple  
17 of years.

18 Q. What was his job position for Senator  
19 Alexander?

20 A. As I said a minute ago, I'm not sure  
21 exactly, but I think it's like district  
22 representative, field representative.

23 Q. And what was it about Mr. Freeman as being  
24 a field representative that makes you think he could  
25 do this job?

1           A.     I don't know if he could do the job. I  
2     wasn't interviewing him that same way. What I was  
3     trying to get a sense of is, there are a lot -- we  
4     only have one government relations position in the  
5     district, I was trying to determine whether there  
6     should be more of a federal focus, more of a state  
7     focus, more of a local focus, where that balance  
8     would be.

9           Q.     So are you looking for someone to fill  
10    that job that has political connections?

11          A.     I'm looking for someone to fill that job  
12    who would be able have great relationships with  
13    people. I'm not sure yet, because I have not posted  
14    an interview for the job, where the balance of  
15    existing political relationships or whether they  
16    have the ability to create those relationships, I'm  
17    not sure.

18          Q.     Okay. Did you make the decision to hire  
19    Mark North?

20          A.     No.

21          Q.     And Mark North, he is Steve North's son,  
22    correct?

23          A.     I believe that's right.

24          Q.     And JoAnn North's son?

25          A.     Accurate.

1 Q. And JoAnn North was the assessor of  
2 property here, correct?

3 A. I don't know what her position was.

4 Q. She had a political role for Metro  
5 Government, correct?

6 A. I don't know that.

7 Q. You don't know that she was a high  
8 official at --

9 A. I do know she was a high official. I  
10 thought it was a high-ranking state official. That  
11 was before my time here in Nashville.

12 Q. Okay. Did you know Steve North was a  
13 judge here?

14 A. I was aware of that.

15 Q. So both of Mark North's parents were  
16 politically connected, correct?

17 A. That seems to be right. I don't know the  
18 extent of their connections.

19 Q. Okay. Is there something about, and I  
20 don't mean this negatively, I'm just trying to  
21 figure out, is there something about hiring someone  
22 that's got political connections that makes them  
23 more attractive to your office?

24 MR. FOX: Objection to the form.

25 THE WITNESS: The -- it would certainly

1 depend on the position. If I'm hiring for a  
2 government relations position that's trying to have  
3 influence upon Metro council, to mayor's office,  
4 state legislature, state department of education,  
5 governor's office, federal -- the full extent of the  
6 federal government, I would expect that that would  
7 be someone that would have knowledge of and the  
8 potential to develop those relationships, which may  
9 include some history of those relationships.

10 BY MS. STEINER:

11 Q. Okay.

12 A. But to be very clear, they -- I'm not  
13 looking -- I would not seek someone just because  
14 they have political connection.

15 Q. Have you served on any political  
16 committees or actions, or anything like that?

17 A. In my personal role or...

18 Q. Yes.

19 A. Back in college, I was president of the  
20 Young Democrats at Young Harris College.

21 Q. Anything with the democratic party here?

22 A. Trying to remember precisely. I am a  
23 member of the democratic party, I don't believe I  
24 have any official role in anything.

25 Q. Have you worked on any campaigns?

1           A.     I volunteered for campaigns as a college  
2 student.

3           Q.     What about as an adult here in Nashville?

4           A.     No, not that I'm aware of.

5           Q.     Okay. I want to ask you just a little bit  
6 about the budget when you were dealing back and  
7 forth with Metro. Who at Metro did you deal with  
8 about the budget in the mayor's office?

9           A.     It was a variety of people, and depends on  
10 what time frame you're looking for. Obviously,  
11 administrations have changed.

12          Q.     What about the last time that you served  
13 in governmental relations, what year was that?

14          A.     That was 2017.

15          Q.     In 2017, who was it in the mayor's office  
16 that you were dealing with?

17          A.     The mayor, Mayor Briley, his chief of  
18 staff, his education liaison, the finance director,  
19 various members of the finance staff for general  
20 government.

21          Q.     So who is it that you would call to say,  
22 this is my aspirational budget, or would it be the  
23 presentation?

24          A.     The -- it would be a combination, so  
25 publicly available presentations, and then at

1 different stages, we would present to the mayor. At  
2 that time, they had a public hearing, and so there  
3 would be a public hearing. But one important  
4 distinction, at that time, under the previous  
5 administration of Metro Nashville Public Schools,  
6 they did not do the aspirational budget. They had  
7 --

8 Q. But they do that now, correct?

9 A. That's accurate.

10 Q. Did you attend those?

11 A. Attend which?

12 Q. Where the aspirational budget is being  
13 presented.

14 A. Not every single one, but the majority of  
15 them.

16 Q. So even though now you are chief of staff,  
17 you still go in and attend those budget hearings  
18 with Metro?

19 A. Yes.

20 Q. For the budget, my understanding of this,  
21 and correct me if I'm wrong, but the budget is not  
22 like a financial statement, because it doesn't have  
23 like the exact figures typically, it's more of a  
24 gross amount that you think you're going to need,  
25 correct?

1 A. Yes.

2 Q. Okay. And it's got -- I don't know what  
3 the term would be built into the budget, but it's  
4 got areas that have funding that you can move from  
5 maybe one area to another, correct?

6 A. I would not say that's...

7 Q. Is it correct, though, that it's not exact  
8 figures and that the budget department can find  
9 areas to cut out of the budget if they are asked to  
10 do so?

11 A. I'm trying to understand -- would you  
12 rephrase your question?

13 MR. FOX: Objection.

14 BY MS. STEINER:

15 Q. Is it true that if you ask the budget  
16 department -- and is there something called the  
17 budget department?

18 A. Yes.

19 Q. Is that the department Chris Henson and  
20 Barry Booker are in?

21 A. The Barry Booker Bronze is one of the  
22 departments that Chris Henson runs.

23 Q. And is it true that if you -- they would  
24 be the experts on what is in that budget and how  
25 they could cut different areas?



1           A.     They would be some of the experts in that  
2 they are responsible for the finances of the  
3 district. It would depend on what we call the  
4 budget owners to determine what the policy positions  
5 are of the district.

6           Q.     What's a budget owner?

7           A.     That would be -- that would be someone who  
8 is responsible for the programmatic implementation  
9 of that area, so a simple -- relatively simple  
10 example would be if we have school nurses that are  
11 out in schools with salaries, that would roll up  
12 into the person who is responsible for school  
13 nurses.

14          Q.     Okay. And it's my understanding that the  
15 different areas are called departments?

16          A.     There is not --

17          Q.     Or they're also called another word, and I  
18 can't --

19          A.     Division?

20          Q.     Division. School choice, is that a  
21 division or a department?

22          A.     It might be an office. These aren't  
23 exactly precise terms.

24          Q.     If it has an account number in the budget,  
25 such as 1725, would that be -- have a budget owner

1 to it?

2 A. Yes.

3 Q. Okay. And would that be the director of  
4 that department?

5 A. I would have to look at the specific  
6 budget to know who the responsible party would be.

7 Q. Okay. Let's see if I can get in this  
8 meeting. Hang on a second.

9 (Off-the-record discussion held.)

10 BY MS. STEINER:

11 Q. Okay. Mr. Clay, can you see this  
12 Metropolitan Nashville Public School fiscal year  
13 2020 to '21 operating budget?

14 A. I can.

15 Q. Okay.

16 MR. FOX: And that's Ms. Steiner scrolling  
17 down, so she'll -- I don't have the ability to  
18 scroll down. She'll scroll for us.

19 THE WITNESS: Ms. Steiner, I know you're  
20 rightly jumping around in my history. During the  
21 2020, 2021 operating budget, I was the chief of  
22 staff, not government relations during that time  
23 period.

24 BY MS. STEINER:

25 Q. That's fine. That's fine. I want to ask

1 you a question about this. These budgets look like  
2 the budgets, though, that you used when you were  
3 there, correct? In government relations, correct?

4 A. Yes.

5 Q. I want to ask you this, and let's go down  
6 to where all the different headings are. Let me go  
7 back just one second. The numbering at the bottom  
8 of this is MG000694, correct?

9 A. That is -- yes. I'm not familiar with  
10 what that means, but...

11 Q. It's Bates stamped for the lawyers so we  
12 know where to find them in the records, I guess.

13 MR. FOX: It's our own page numbering  
14 system.

15 BY MS. STEINER:

16 Q. Okay. Now, I want to ask you about this.  
17 Do you see the numbers on the side, the account  
18 number?

19 A. Yes.

20 Q. For instance, human resources, 1200?

21 A. Yes.

22 Q. Is that a function number? Do you all  
23 call that a function number or department?

24 A. Account number would be the most specific.  
25 This may be a question -- it may be a term of art

1 that the budget team uses. I'm not sure. But  
2 function or account number.

3 Q. Human resources and talent services, is  
4 that a department?

5 A. Yes.

6 Q. Employee relations, is that a department?

7 A. No. That would probably be more of an  
8 office of human capital.

9 Q. There's not anything called human capital.

10 A. Forgive me. Human resources and talent  
11 services.

12 Q. Okay. Chief of staff, is that a  
13 department?

14 A. I would say it's more of an office.

15 Q. Who does it report to?

16 A. The director of school, but you may be --  
17 who was responsible for that budget, and I am.

18 Q. So for chief of staffs, would they have  
19 had a budget owner?

20 A. Yes.

21 Q. Okay. Same thing, everything that's  
22 bolded here that's got -- such as chief of staff,  
23 employee benefits, chief operating officer,  
24 purchasing fiscal services, school audit, financial  
25 operations, school choice, do they all have their

1 own individual budget owner?

2 A. I believe that's correct.

3 Q. So then those budget owners, you could  
4 contact them and ask them, where can you make a cut  
5 in this budget, if you wanted to, correct?

6 A. It would be a variety of people. They  
7 would be one of the people that might have knowledge  
8 and information over it.

9 Q. Do you know whether or not any of the  
10 budget managers were contacted in the spring of 2020  
11 to ask them about whether or not they could make  
12 budgets so you did not have to reduce out the  
13 1 million in jobs in central office?

14 A. Do I know if any budget owners were?

15 Q. Yes.

16 A. Probably. What was the second part of  
17 your question?

18 Q. Okay. Do you know whether or not any of  
19 the budget owners were contacted about their budget  
20 in the spring of 2020 to see whether or not they  
21 could make cuts in their budget so that you would  
22 not have to reduce out -- let me stop this a second.  
23 Did you know that was a reduction of jobs in central  
24 office due to the budget?

25 A. Yes.

1 Q. And was that the reason the jobs were  
2 reduced out, the budget?

3 A. There -- it would depend on the specific  
4 job. I believe there were a variety of reasons, but  
5 that was one of them.

6 Q. Okay. Associate superintendent, what was  
7 the reason?

8 A. That, and a general reorganization.

9 Q. Okay. So it wasn't just the budget?

10 A. There -- correct. It was budget and  
11 general reorganization.

12 Q. Okay. What about director of school  
13 choice?

14 A. Budget.

15 Q. And no other reason, correct?

16 A. I want to make sure I'm being very precise  
17 and remembering correctly.

18 Q. That's why I'm asking you.

19 A. Yes. That was purely a budget reason.

20 Q. Okay. Did anyone, to your knowledge,  
21 contact any of the budget owners in the spring of  
22 2020 to see whether or not they could make cuts in  
23 their budget?

24 A. Yes.

25 Q. Who did the contacting and who did they

1 contact?

2 A. I would not know the comprehensive list of  
3 that, because it's a complicated, fast-moving  
4 process. Certainly -- certainly Chris Henson would  
5 have been involved. I would have been involved.  
6 Dr. Battle would have been involved. I would not  
7 have recollection of what specific people were  
8 contacted for that.

9 Q. But Chris Henson was contacted and asked  
10 to contact the department heads to see whether or  
11 not they could make cuts in the budget?

12 A. I wouldn't know that precisely. It was --  
13 I wouldn't characterize that he was contacted to ask  
14 to contact every single budget owner to figure out  
15 if there were cuts that they planned to make for  
16 their budget. It is a regular process in each  
17 budget year for us to determine if there are areas  
18 of the budget that budget owners feel like could be  
19 reduced. So that is a quarterly process that leads  
20 up to -- so we would have that information leading  
21 up to individual moments that may come up.

22 Q. I'm not talking about regular parts of the  
23 budget where you look and see whether or not you can  
24 just cut areas because it's superfluous or whatever.  
25 What I'm asking you is something different. Was

1 Chris Henson contacted to say, talk to any budget  
2 manager about whether or not you have a reduction so  
3 we do not have to reduce out jobs such as director  
4 of school choice or the associate superintendents?

5 A. That would -- we would have had the  
6 information leading into that about potential cuts,  
7 different areas and so...

8 Q. Did any -- this is --

9 MR. FOX: Objection. Let him finish  
10 answering.

11 THE WITNESS: And so if the -- so that  
12 information would inform any future decision that we  
13 would be making about budgets.

14 BY MS. STEINER:

15 Q. Okay. How did you get the potential cuts?  
16 Was it a document that someone gave you?

17 A. The potential cuts? During each of the  
18 quarterly budget meetings, Mr. Booker leads those,  
19 and he identifies if there are areas to cut and I'm  
20 not sure if it is a document.

21 Q. My question to you is different. Did you,  
22 or anyone to your knowledge, contact anyone in the  
23 department? That means Chris Henson, Barry Booker  
24 or anyone else to say, hey, we're going to start  
25 eliminating jobs due to the budget, is there any



1 other area that you know of that we can cut instead?

2 A. The way that you're phrasing the question  
3 is not how it would work, in general. We -- you  
4 have to take in context of many years of cutting the  
5 budget, because of not, as you mentioned earlier,  
6 getting our aspirational budget, in fact, getting  
7 less than even the inflationary pressure, so the --  
8 so we try as much as possible to cut from what at  
9 that time was known as the central office instead of  
10 school-based budgets. Unfortunately, many things  
11 have been cut over the years and we provide most of  
12 our services through people, and so I'm not -- so  
13 many cuts have been made over the years and we're  
14 basically down to people.

15 Q. Back to my question. My question is, in  
16 the spring of 2020, did you or anyone to your  
17 knowledge contact anyone from Chris Henson or Barry  
18 Booker's office to say, we are going to cut jobs, is  
19 there any area we can cut out instead of the jobs?

20 A. That just isn't how it works because --

21 Q. Is that -- so then is that answer a no?

22 A. No, in that -- I don't remember any  
23 specific questions like that.

24 Q. Okay.

25 A. Because that's not how it works.

1           Q.     Okay. Well, so then you cut jobs without  
2 knowing whether or not there may be other areas to  
3 cut?

4           A.     That's not what I said.

5           Q.     Okay.

6           A.     What you're asking is -- if you're asking  
7 did we have information to be able to determine  
8 where we had made extensive cuts for the past many  
9 years in public education and when we are facing  
10 such a monumental hurdle, what we had to do to be  
11 able to get to there, that was a collective  
12 knowledge that we had built over a period of time.  
13 It wouldn't have been as simple as one specific  
14 moment asking for people to make that type of  
15 determination.

16          Q.     Now, the 1 million that you cut in jobs,  
17 that was one percent of one percent of the budget,  
18 correct?

19          A.     I would have to do the math, but that  
20 sounds accurate.

21          Q.     And you said you had a monumental hurdle,  
22 what was the monumental hurdle?

23          A.     At that time, we were entering the first  
24 phases of the pandemic. As you may recall,  
25 everything was unknown at the time. The monumental

1 hurdle to which I was referring was that the City of  
2 Nashville had asked Metro schools during the last  
3 quarter of the fiscal year to cut \$100 million from  
4 our budget.

5 Q. Okay. Now, \$100 million from what budget?

6 A. From the operating budget.

7 Q. So rather than getting, if you've got  
8 914 million in the year 2018 to 2019, you were only  
9 going to get 814 million?

10 A. Well, they were asking to only spend 814  
11 million in actual expenses.

12 Q. Okay. So then you were -- you got cut  
13 down from 914 million to 814 million?

14 A. That -- the way you phrase it is not  
15 accurate. What we -- we were asked to look at  
16 making \$100 million reduction in our actual  
17 expenses.

18 Q. And your actual expenses that you said you  
19 had for the year before was 914 million.

20 A. It would have been for that current year  
21 that we were in, 914 million. So for the current  
22 year, it was 914 million, about, that we were  
23 operating within. They were asking for us to  
24 actually spend the equivalent of 814 million.

25 Q. Okay. And that's why you were having the

1 budget issues and having to eliminate the position  
2 of director of school choice?

3 A. Yes.

4 Q. Okay. And if you hadn't had that, would  
5 you have eliminated the position of director of  
6 school choice?

7 A. No.

8 Q. In fact, that's a very important position,  
9 isn't it?

10 A. The functions of that office are very  
11 important. It would be difficult to say if that  
12 actual position was crucial to that.

13 Q. Do you know my client, (name spoken off  
14 record)?

15 A. I do.

16 Q. Okay. We're going to call her Jane Doe  
17 throughout this deposition, okay? Is that okay?  
18 Can we agree to that?

19 A. Agreed.

20 Q. Now, Jane Doe, do you know what type of  
21 job she did, what type of performer she was as  
22 director of school choice?

23 A. I would not have access to that  
24 information now.

25 Q. Do you have any e-mails, text messages,

1 letters from Metro Government saying that you have  
2 to cut from 914 million down to 814 million in your  
3 budget?

4 MR. FOX: Objection to the form.

5 THE WITNESS: I would assume that there  
6 were e-mails to that effect. I don't recall  
7 specifically what they would have been. And to  
8 clarify, they always talked about it in terms of  
9 cutting \$100 million per budget. They didn't phrase  
10 it in the way that you just did.

11 BY MS. STEINER:

12 Q. But that was your understanding of it,  
13 correct?

14 A. Accurate.

15 Q. Now, did -- who was it that told you this?

16 A. It was majority -- the majority of the  
17 time, it was the director of finance for general  
18 government, Kevin Crumbo.

19 Q. Kevin, what was his last name?

20 A. Crumbo, C-R-U-M-B-O.

21 Q. Okay. And if you had not had to cut your  
22 budget down to 814 million, would you have gotten  
23 rid of the associate director job? Excuse me,  
24 associate superintendent jobs.

25 A. Those were positions that -- it was a

1 variety of factors including organizational changes,  
2 but the budget certainly pressed on the point  
3 further.

4 Q. Would you have gotten rid of those jobs if  
5 not for the budget?

6 A. Yes.

7 Q. Okay. So the budget really had no bearing  
8 on the elimination of those jobs, correct?

9 A. That's not accurate. They -- it was a  
10 factor in the timing, it was a factor in the context  
11 of the situation. It was a combination between  
12 those things, those two things.

13 Q. Okay. Now, let me go to this budget that  
14 I've shown you. Now, do you see school choice,  
15 1725?

16 A. Yes.

17 Q. Did you know that Jane Doe was the  
18 director of school choice?

19 A. Yes.

20 Q. So she would have been the --

21 A. Well, let me clarify. Would you go back  
22 to the top of which budget this is?

23 MR. FOX: Scroll up.

24 BY MS. STEINER:

25 Q. Do you need the first page?

1           A.     Yes, ma'am. So for the fiscal year 2021,  
2 I do not believe that she was the director of school  
3 choice that year.

4           Q.     Was she the director of school choice when  
5 this budget was adopted on June 30th, 2020?

6           A.     I'm not aware of precisely which date she  
7 was not in that position.

8           Q.     Was she the director of school choice in  
9 the spring of 2020?

10          A.     Yes.

11          Q.     So when this budget was being put  
12 together, was she the budget owner for school  
13 choice?

14          A.     Yes.

15          Q.     Now, I want to ask you about something.  
16 Did you have anything to do with the budget managers  
17 going in and having the budgets approved?

18          A.     That's a broad question. Would you  
19 rephrase that a little bit more specifically?

20          Q.     Are you there when the budget managers  
21 present their budgets?

22          A.     Not in all cases.

23          Q.     Were you there when Jane Doe presented the  
24 school choice budget?

25          A.     I don't recall precisely. I don't have

1 recollection of it.

2 Q. If she says you were present, would you  
3 dispute that?

4 A. No.

5 Q. Now, I want to ask you a question about  
6 this and I want to find out whether or not you know  
7 this. Do you see this contracted services under  
8 school choice number 9, which if you go across, it's  
9 got \$178,000 and says, school choice  
10 software/Firefly?

11 A. I do see that.

12 Q. Did you know that Jane Doe had removed  
13 that from the budget because it was only 20,000 that  
14 was required for that that year?

15 A. I don't have specific recollection of  
16 that.

17 Q. Did you know that -- when she presents her  
18 budget to Metro schools, who does she present it to?

19 MR. FOX: Objection to the form.

20 BY MS. STEINER:

21 Q. Do you know?

22 A. I would assume -- no, I don't know, is the  
23 answer to your question. I don't know precisely. I  
24 would assume that it would be Barry Booker, head  
25 over the budget office.



1 Q. Okay.

2 A. I would also point out that you cannot  
3 take any sole budget function in an isolated silo.

4 Q. Now, did you know that Jane Doe watched  
5 them change her budget to reduce that to 20,000 for  
6 school choice?

7 A. No.

8 Q. Do you know that in the final budget, it  
9 was increased back to 178,000?

10 A. No.

11 Q. Do you have any idea how that could have  
12 occurred?

13 A. No.

14 MR. FOX: Objection to the form.

15 BY MS. STEINER:

16 Q. Would you agree that if the only thing  
17 that's being paid to Firefly that year is 20,000,  
18 that that's an overage in this budget of \$157,000?

19 A. I would have to know much more specifics.  
20 For example, was it replaced with a different  
21 expense, was that a different contractor being used.  
22 I wouldn't have those details.

23 Q. Okay. Has anyone from your office or  
24 anyone at Metro Schools investigated what should  
25 have been the amount paid for Firefly and why did it

1 get changed in the budget?

2 A. I have not investigated and I wouldn't be  
3 aware of -- I'm not aware of any other.

4 Q. Did you know Jane Doe was contacted by  
5 people in her office after she lost her job due to  
6 the budget, telling her, we've got 178,000 in our  
7 budget for Firefly that we don't know how to spend  
8 the money and they could have kept you? Did you  
9 know that happened?

10 MR. FOX: Objection to the form.

11 THE WITNESS: No. I don't know that.

12 BY MS. STEINER:

13 Q. Would you agree that if they had an  
14 overpayment of 158,000 in school choice, they could  
15 have funded Jane Doe's job?

16 A. That isn't how the budget works. The  
17 budget is a totality, and you have to think of  
18 everything in context of the entire budget.

19 Q. If you had asked a budget manager, can you  
20 make cuts in your department, and they told you,  
21 well, we've got 178,000 targeted for a particular  
22 contract that's going to be decreased to 20,000,  
23 would you have expected that budget manager to tell  
24 you that?

25 A. That was a long question. Would you

1 repeat it?

2 Q. Would you expect a budget manager to tell  
3 you if there is 158,000 that's in the budget that's  
4 not needed for a contract?

5 A. To tell me, no.

6 Q. Would you expect them to tell Metro  
7 Schools it's not needed?

8 A. Yes. But a budget owner is only one  
9 percent of the process, so you're asking about a  
10 very specific example that I don't have the  
11 knowledge of, but the budget owner is only one  
12 portion of the total information.

13 Q. Okay. Now, let's get back to this, and I  
14 want to make sure, because I don't think -- in the  
15 meetings in the spring of 2020, did you or anyone to  
16 your knowledge, talk to anyone in the budget  
17 department to see whether or not there were other  
18 cuts that could be made before you start hitting  
19 personnel?

20 MR. FOX: Objection to the form.

21 THE WITNESS: The -- so in the spring of  
22 2020, there are a series of budget meetings leading  
23 up to the formation of the budget, and in those,  
24 yes, we would expect budget owners to bring forward  
25 potential savings, and that information helps to

1 inform the situation.

2 BY MS. STEINER:

3 Q. Mr. Clay, the question to you is a little  
4 different, and this is what I want the answer to.  
5 In the spring of 2020, did you or anyone to your  
6 knowledge contact anyone from budget to see whether  
7 or not there were any other cuts that could be made  
8 before you started cutting personnel?

9 MR. FOX: Objection to the form.

10 THE WITNESS: That's just not how it  
11 works. I mean, we have an entire system that has a  
12 variety of input to the information, and so the idea  
13 that you may do something before cuts to personnel,  
14 that's just -- it had to be taken in totality.

15 BY MS. STEINER:

16 Q. So then are you telling me that you cut  
17 personnel before you go in to see whether or not  
18 there's fluff somewhere else in the Metro budget?

19 A. That there's what?

20 Q. Fluff. Extra funds that you could cut.  
21 Is that what you're telling me?

22 A. In -- for what we are trying to do, we  
23 always try to be as efficient as possible, so we  
24 don't expect there to be fluff in the budget. This  
25 is after years of underfunding, inadequate funding

1 that made us cut extensively for years and years,  
2 and so -- and it's not any one particular situation,  
3 it's the totality of the budget, and so we try to be  
4 as efficient as possible.

5 Q. Do you cut personnel before you go in to  
6 see whether or not there's contracted services or  
7 any other area that you can cut?

8 A. There have been actually extensive reviews  
9 to the contracted services over the past several  
10 years leading up to that budget that analyzed  
11 whether there were places to be cut, so, yes, those  
12 occurred before we made cuts to personnel.

13 Q. And did you tell Barry Booker and Chris  
14 Henson in the spring of 2020, can you find 1 million  
15 in cuts somewhere so we don't have to cut out these  
16 jobs?

17 A. It wasn't \$1 million, it was \$100 million  
18 in cuts we were making, so we cut bus services with  
19 a contracted vendor. It would be difficult for me  
20 to remember at this point all the things that we  
21 cut.

22 Q. Let's go back. I want to tell you what  
23 I'm interested in here. Do you see this budget,  
24 final budget, operating budget, fiscal year, and  
25 then you go down here, okay, do you see the proposed

1 changes of the reductions that you've got here?

2 A. Yes, ma'am.

3 Q. Do you see central office reorg, five  
4 jobs, savings of 1 million?

5 A. I do.

6 Q. That's what I'm talking to you about. I  
7 want to talk to you about the central office reorg.  
8 Bus drivers are not in central office, correct?

9 A. Well, again, that's the totality of the  
10 budget.

11 Q. I want to talk to you about central  
12 office, okay? Let's talk about central office. You  
13 cut five jobs from central office, correct?

14 A. According to this document, there was a  
15 reduction of five full-time equivalent positions.

16 Q. Okay. And that was at a savings of \$1  
17 million, correct?

18 A. Yes.

19 Q. Did you talk to anyone in Chris Henson's  
20 office to say, we're going to cut five jobs from  
21 central office and we're only going to save  
22 1 million, can you find the 1 million someplace  
23 else?

24 A. Exactly in this document that you're  
25 pointing to there's a total of \$15.2 million in

1 reductions that we made, so, yes, I guess you're  
2 helping me remember.

3 Q. My question is different, okay? Did you  
4 ask anyone, rather than cutting out \$1 million here,  
5 can you find \$1 million someplace else?

6 MR. FOX: Objection to the form.

7 THE WITNESS: Yes, Ms. Steiner. So if you  
8 see here, thank you for bringing this to my  
9 attention, there are \$820,000 in savings to the  
10 central office and the IT transfer to capital, waste  
11 disposal a centralized point there. That's  
12 \$250,000. That right there adds up to \$1.2 million.

13 BY MS. STEINER:

14 Q. Let me stop you, okay? You've got a  
15 million listed here, correct?

16 A. Yes.

17 Q. Did you look for a million anyplace else  
18 other than these areas that are listed here?

19 MR. FOX: Objection to the form.

20 THE WITNESS: We went through the entire  
21 budget and found \$15.2 million in savings, 14.2  
22 separate from these five positions you're referring  
23 to. So, yes, obviously, we went through the budget  
24 to find this.

25 BY MS. STEINER:

1           Q.     Let me tell you this and maybe we can cut  
2 through the chase here. Mr. Hansen's and  
3 Mr. Battle's depositions have both been taken --

4           A.     Okay.

5           Q.     -- and both have said, we were never asked  
6 to find an additional million, and if we had, we  
7 could have found it.

8           MR. FOX:   Objection to the form.

9 BY MS. STEINER:

10          Q.     Okay. So did anyone from your office ask  
11 Chris Henson or Barry Booker, or anybody from their  
12 office, if they had \$1 million they could find so  
13 you would not have to eliminate these jobs?

14          MR. FOX:   Objection to the form.

15 BY MS. STEINER:

16          Q.     Yes or no?

17          A.     Our -- our --

18          Q.     Yes or no and then you can explain.

19          MR. FOX:   Objection to the form. It's  
20 asked and answered multiple times.

21          THE WITNESS: We found \$15.2 million in  
22 savings just in this budget alone, not counting the  
23 actual that we reduced, so the idea that it's  
24 just -- that the only thing that we did was these  
25 five positions, it has to be taken into totality.



1 BY MS. STEINER:

2 Q. I want to ask you specifically, okay, and  
3 I think you understand my question, don't you?

4 A. I'm answering it to the best of my  
5 ability.

6 Q. I want to know about the 1 million,  
7 specifically the 1 million, did you ask anyone in  
8 the budget department, we are going to cut five  
9 jobs, is there any other area that you can find,  
10 because they're saying you never asked them.

11 MR. FOX: Objection to the form.

12 THE WITNESS: I don't know how it's  
13 possible not to have asked and found those things  
14 out. Remember, this is not just one moment in time,  
15 this is leading up. We had this information. We  
16 cut \$15.2 million from the budget.

17 BY MS. STEINER:

18 Q. You always cut items from the budget,  
19 didn't you?

20 A. I'm not sure that's accurate.

21 Q. Have you ever had a year that you've been  
22 there that's been zero in cuts?

23 A. We always -- first of all, would you  
24 define what you mean by "cuts?"

25 Q. The proposed changes, this area here where

1 you've got the 15 million listed here, you've always  
2 got that in every single budget, don't you?

3 A. Well, first of all, I don't have knowledge  
4 of every single budget of Metro Schools, do we  
5 always try to find efficiencies? Yes, we do.

6 Q. Do you always, every year, have items cut  
7 from the budget in that category?

8 MR. FOX: Objection.

9 BY MS. STEINER:

10 Q. That you know of?

11 MR. FOX: Objection to the form.

12 THE WITNESS: I really would not, without  
13 being able to review the documents, I wouldn't know  
14 the answer. Do we always try to go through and find  
15 inefficiencies in the budget? Yes, we do.

16 MS. STEINER: Can we have this marked  
17 Exhibit Number 1. It's the final budget here.

18 (WHEREUPON, the  
19 previously-mentioned document was  
20 marked as Exhibit Number 1.)

21 BY MS. STEINER:

22 Q. So are you telling me then under oath  
23 today that there may have been a budget that you  
24 were involved with that the total, the proposed  
25 changes where the cuts came out to be zero?

1 A. No. That's not at all what I'm saying.

2 Q. Okay.

3 A. I was just saying I don't have a specific  
4 memory of all of those documents. I'd be glad to  
5 review any documents that you have to give you an  
6 answer to that.

7 Q. Okay. I'm going to pull up some of those  
8 older ones in just a bit.

9 And am I sharing this? Can you see this?

10 A. I can see a document that says October --  
11 or April 19, 2019 budget. (Disruption occurred.)

12 MS. STEINER: Hang on one second.

13 BY MS. STEINER:

14 Q. Can you see this April 19, 2019 budget?

15 A. Yes.

16 Q. Let's go down to the very first page of  
17 this. Do you see the savings there, the proposed  
18 changes? You've got 7,761,000 in that year,  
19 correct?

20 A. Yes.

21 Q. So then -- it just seems so basic that  
22 every year you're going to have some changes that  
23 reduce things out when you have a \$914 million  
24 budget, correct?

25 A. I agree that every year we make

1 efficiencies. This year was half the amount that we  
2 had to make in the year you were first asking me  
3 about.

4 Q. So the year that we're talking about was  
5 more akin to 7 to 8 million that had to make that  
6 was additional?

7 A. It would appear, yes.

8 Q. Let's make the April 19, 2019 Exhibit  
9 Number 2.

10 (WHEREUPON, the  
11 previously-mentioned document was  
12 marked as Exhibit Number 2.)

13 MR. FOX: No objection.

14 BY MS. STEINER:

15 Q. Okay. Now, did you know that Barry Booker  
16 testified that if he had been asked to find an  
17 additional one million, he could have?

18 A. No.

19 MR. FOX: Objection to the form.

20 BY MS. STEINER:

21 Q. Did you know that Mr. Henson testified the  
22 same way, I believe?

23 A. No.

24 MR. FOX: Objection to the form.

25 BY MS. STEINER:

1 Q. Would you agree that if they could find an  
2 additional one million in other areas that you would  
3 not have had to eliminate Jane Doe's job?

4 A. Would you repeat that question?

5 Q. Would you agree that if you had found that  
6 extra one million in other areas, you would not have  
7 eliminated Jane Doe's job?

8 MR. FOX: Objection to the form.

9 THE WITNESS: It's a hypothetical that I  
10 don't know the answer to.

11 BY MS. STEINER:

12 Q. What do you do as chief of staff?

13 A. What are my job duties?

14 Q. Yes.

15 A. In the broadest sense, my goal is to enact  
16 the vision that the director of school sets for the  
17 district and help lever reorganization to achieve  
18 those objectives. I can go into more specifics if  
19 needed.

20 Q. Did you work alongside Dr. Battle with  
21 regard to this reorg and budget issue?

22 A. I did, for components of it.

23 Q. Okay. What components did you work on?

24 A. Let's see, I worked alongside the decision  
25 to move the school option function under my team

1 under a different position. I worked with her on  
2 some components of the reorganization around how we  
3 are overseeing schools. I worked with her some on  
4 reorganizing the human resources department.  
5 There's an additional position in school  
6 administration that I worked with her on. That  
7 reorganization, that position went away, as well.

8 Q. Now, did you work with her about  
9 eliminating the associate superintendent positions?

10 A. Yes.

11 Q. Why was that done?

12 A. It was done for a combination of reasons.  
13 The budgetary reason that we've already talked  
14 about, as well as organizational changes and  
15 reasons.

16 Q. What were the organizational reasons?

17 A. We were trying to streamline our reporting  
18 to make the supervision of the schools as efficient  
19 and effective as possible, and trying to ensure that  
20 our -- that there was great alignment between our  
21 academic and curriculum work, as well as school  
22 supervision.

23 Q. As a practical matter, you had four  
24 associate superintendents, correct?

25 A. Yes.

1 Q. And the executive directors reported to  
2 the associate superintendents, correct?

3 A. Yes. Executive director is a broad term,  
4 but in the way that you're thinking of it, yes.

5 Q. Okay. And then the associate  
6 superintendents reported to who?

7 A. At that point, there was a vacant -- well,  
8 there was one vacant and one interim position, so  
9 they reported to the director of schools at that  
10 point, but that's because there was a vacancy in the  
11 chief of school position.

12 Q. Okay. So then the executive -- the  
13 associate superintendents reported to the chief of  
14 schools?

15 A. Yes, but that position was vacant.

16 Q. Okay. And is that the one that was filled  
17 by Mason Bellamy?

18 A. Yes, but it was actually a combined chief  
19 role. There was a combination of the chief of  
20 academics role and the chief of schools role, so it  
21 was a combined, consolidated position. Does that  
22 make sense?

23 Q. Let's go back. We're in the spring of  
24 2020?

25 A. Uh-huh.

1           Q.     Executive directors report to the  
2     associate superintendents, and the associate  
3     superintendents reported to who?

4           A.     They reported to a vacant position.

5           Q.     And what was the vacant position?

6           A.     Chief of schools.

7           Q.     Who did the chief of schools report to?

8           A.     The director of schools.

9           Q.     How long had that position been vacant?

10          A.     Since the summer of 2019.

11          Q.     And what had Metro done to fill that  
12     position?

13          A.     Would you rephrase your question?

14          Q.     What had Metro Schools done to fill that  
15     position? Had they advertised for it, had  
16     applicants for it, had they interviewed for it?

17          A.     At that point in 2020, I don't believe so.  
18     I think Dr. Battle was still determining what she  
19     needed in the position. I believe she believed that  
20     she -- initially -- eventually ended up posting for  
21     the position.

22          Q.     And so she posted for the chief of schools  
23     position?

24          A.     Yes.

25          Q.     And who is the chief of schools now?



1 A. We do not have that position any longer.

2 Q. Did anyone get hired as chief of schools?

3 A. No.

4 Q. So even though she posted for it, it was  
5 never filled?

6 A. No. I'm sorry, that's not what I was  
7 saying. What I was saying is, she ended up  
8 combining the efficiencies that we talked about.  
9 She ended combining the chief of academics with the  
10 chief of school position to create this newly  
11 combined and expanded role to help create  
12 efficiencies for the district.

13 Q. So then she never advertised for the chief  
14 of schools position?

15 A. What do you mean by advertise?

16 Q. There was never a posting, we've got a  
17 chief of schools opening here, it was a combined  
18 position that was posted, correct?

19 A. I believe that's accurate. I believe  
20 that's accurate. I'm not trying to be difficult. I  
21 just don't understand.

22 Q. And the combined position, what was it  
23 called?

24 A. Chief of academics in schools.

25 Q. Okay. And who was in that position?

1 A. Dr. Mason Bellamy.

2 Q. Okay. And who was the chief of academics  
3 back in the spring of 2020?

4 A. It was an interim position. It was  
5 Dr. David Williams.

6 Q. Okay. So then in the spring of 2020, the  
7 associate superintendents were reporting directly to  
8 the director of schools, correct?

9 A. Correct.

10 Q. And in the 2020 through 2021 school year,  
11 the executive directors were reporting to this  
12 combined position?

13 A. That's correct.

14 Q. That Mason Bellamy filled?

15 A. That's correct.

16 Q. And Mason Bellamy was reporting to the  
17 director of schools?

18 A. That's correct.

19 Q. Now, when the executive directors were  
20 reporting to the associate superintendents, were  
21 they giving them the same information that they now  
22 give to Mason Bellamy?

23 A. I would not have insight into that.

24 Q. Okay. Do you know whether or not Mason  
25 Bellamy is providing the director of schools with

1 the same information that the associate  
2 superintendent provided her?

3 A. I'm not sure the extent of the information  
4 that the associate -- that the superintendents give  
5 to the director of schools.

6 Q. Can you tell me, organizationally, why --  
7 whether or not there were any comparisons above of  
8 the job to see whether or not associate  
9 superintendents were the jobs you needed to reduce  
10 out as opposed to some other position?

11 A. Comparison of other types of jobs?

12 Q. Anything in central office?

13 A. We obviously looked for a variety of  
14 positions.

15 Q. Such as?

16 A. Such as ones that we've already referred  
17 to of the school options. We looked at executive  
18 officer of -- it was a human resources. I can't  
19 remember the precise title.

20 Q. Organizational development?

21 A. That sounds right. And executive officer  
22 that was also in the school administration that I  
23 believe had to do with maybe continuous improvement.  
24 I can't remember the precise title.

25 Q. Federal contracts?

1           A.     No.   That's not the one I'm referring to.

2           Q.     Now, the question is different.   Are you  
3   telling me that you compared associate  
4   superintendent, the elimination of those jobs to the  
5   executive officer of organizational development to  
6   see which one you needed to eliminate?

7           A.     I'm not sure I understand your question.  
8   So those would be in separate departments.   There  
9   would not be a comparable position to the associate  
10   superintendent position.

11          Q.     Did you make the decision along with Dr.  
12   Battle to eliminate those four associate  
13   superintendents?

14          A.     That was her decision.   I helped to  
15   advise.

16          Q.     And what was your advice?

17          A.     That there seemed to be efficiencies  
18   gained with that and a clear line of the supervision  
19   between the principal and the administration.

20          Q.     Explain that.   What do you mean?

21          A.     Instead of having an extra layer, so  
22   instead of having the director of schools, the chief  
23   of schools, four different supervisors who then  
24   supervised something like 15 other supervisors, to  
25   them reach principals, it made more sense to ensure

1 there was a closer line and that one of those  
2 elements wasn't needed anymore, and that was the  
3 community superintendent role.

4 Q. Did you hire any outside agencies to come  
5 in to help you to see whether or not that role was  
6 needed?

7 A. No.

8 Q. Did you do any sort of studies to see what  
9 the actual reporting structure was from the  
10 superintendents to the director?

11 A. Formal study, no, but extensive expertise  
12 in that area from the director of schools.

13 Q. Dr. Battle?

14 A. Correct.

15 Q. So it was Dr. Battle who just basically  
16 decided that?

17 A. Dr. Battle through her extensive  
18 experience in each of those levels.

19 Q. Now, we asked for Metro to produce all  
20 documents related to this reorg and budget problem  
21 and we didn't get a whole lot. Did you keep any  
22 notes about what you were discussing and why you  
23 were eliminating the associate superintendent  
24 positions?

25 A. No.

1 MR. FOX: Objection to the form.

2 THE WITNESS: And let me clarify.

3 Whatever we did have, we provided, but that would be  
4 the extent to my notes.

5 MS. STEINER: Did the court reporter get  
6 the no at the very beginning?

7 THE COURT REPORTER: Yes, I did.

8 BY MS. STEINER:

9 Q. And so let me show you the two documents I  
10 did get. And I want to see if you know what they  
11 are and when they were created. This is the first  
12 one. Can you see this?

13 A. Yes.

14 Q. Do you know what this is?

15 A. Looks like either an agenda or -- agenda  
16 for the school board.

17 Q. And the date is May 26, 2020?

18 A. Yes.

19 Q. And if you go down to the very bottom, it  
20 says MG 000167; is that correct?

21 A. Yes.

22 Q. Let's go to almost the tail end of this.  
23 This looks like just a typical meeting, correct?  
24 Are you familiar with this?

25 A. Yes. It was standard.

1 Q. Do you attend those meetings?

2 A. I do.

3 Q. And so you're familiar with the school  
4 board agenda, correct?

5 A. Yes.

6 Q. Did you see Chris Henson is the secretary?

7 A. Yes.

8 Q. I want to ask you a question about that  
9 real quick. If you're the secretary, that means  
10 you're a member of the board, aren't you?

11 A. No.

12 Q. Did you know that he gives his signature  
13 to an employee in the school board department and  
14 she uses it to stamp his signature on documents?

15 A. No. I'm not aware of that.

16 Q. Do you see any sort of a conflict with  
17 Mr. Henson being the board secretary?

18 A. No.

19 Q. Okay. Are you -- do you see this, it's  
20 called central office reorganization plan?

21 A. I do.

22 Q. Have you seen this before?

23 A. I'm reviewing. That looks familiar.

24 Q. Do you know who typed it?

25 A. No.

1 Q. At the bottom of the page, says MG 000181?

2 A. I see that.

3 Q. Do you know who provided the information  
4 that was put in here?

5 A. I don't recall.

6 Q. Do you know why it's a different type than  
7 the rest of the board agenda?

8 A. The rest -- the way that the board agenda  
9 is put together is through collating several  
10 documents, and so the previous documents that you  
11 just scrolled through, for example, were the  
12 contracts. Those are produced by the contracts  
13 office. The board agenda is produced by the -- the  
14 top page of the agenda, the index, is provided by  
15 the board, the board office. I don't know if in  
16 this document that you have pulled up, whether  
17 there's the Powerpoint from any presentations that  
18 were made. Oftentimes, there's a Powerpoint that's  
19 made by the program area, so a lot of people  
20 contribute to the documents that go into this.

21 Q. Now, do you see this central office  
22 reorganization plan?

23 A. I do.

24 Q. Do you recall specifically seeing this in  
25 the spring of 2020?



1 A. I -- I don't remember.

2 Q. Okay. And just for the record, you can't  
3 tell me who provided the information in this central  
4 office reorganization plan, correct?

5 A. I would assume human resources and/or  
6 Metro Legal advising, but I can't -- I don't have a  
7 specific memory of this.

8 Q. Do you recall any discussion with the  
9 school board about the central office reorganization  
10 plan and whether it was necessary or not necessary  
11 or any of the details about it?

12 A. Yes.

13 Q. What?

14 A. Those were made -- and Dr. Battle, she  
15 regularly has one-on-ones with school board members  
16 to talk through the business of the school district  
17 that come between the school board meetings, and she  
18 talked about the reorganization plan during those.

19 Q. How do you know that?

20 A. Well, let me be more specific. I know  
21 that she planned to talk to them during that time.  
22 I did not sit in on them.

23 Q. Were you present?

24 A. No.

25 Q. Okay. So Dr. Battle will go to the

1 individual school board members that's not in a  
2 public meeting and discuss the reorg?

3 A. So is your question does Dr. Battle also,  
4 in addition to school board meetings, have  
5 individual meetings with individual school board  
6 members on a regular basis, yes, she does do that.

7 Q. And you -- Dr. Battle, I assume told you  
8 she was going to go and talk to these individual  
9 board members about her central office reorg plan?

10 A. About the plan before to see if they had  
11 individual questions, to see -- yeah, to see if they  
12 had individual questions.

13 Q. And do you know what was said to the board  
14 members?

15 MR. FOX: Objection.

16 THE WITNESS: No.

17 BY MS. STEINER:

18 Q. Do you know if she met with all of them  
19 individually?

20 A. I know that in -- I don't remember for the  
21 specific one. Her regular practice is to invite  
22 every single board member to generally a 30-minute  
23 session, and board members, of course, are their own  
24 bosses. They can choose whether they show up or  
25 not.

1           Q.     Are the sessions individually? Her one on  
2 one with the board member?

3           A.     That's accurate. Probably during this  
4 time, it was over Teams because of the pandemic.

5           Q.     And in these meetings, Dr. Battle told you  
6 that she was going to discuss her central office  
7 reorg plan with each one?

8           A.     That's correct.

9           Q.     Was she going to get their approval for  
10 whether or not she should do the plan?

11          A.     Approval wouldn't have been appropriate,  
12 because that would be an action by the board. She  
13 wanted to make sure that if they had questions that  
14 she was able to answer those.

15          Q.     Do you know whether or not they had any  
16 questions in any of these private meetings?

17          A.     I wasn't in the individual meetings.

18          Q.     Okay. In the actual public hearing, were  
19 you present?

20          A.     In the public school board meeting?

21          Q.     Yes.

22          A.     I probably was. I don't remember  
23 specifically, but I generally go to them.

24          Q.     Do you recall that there was no discussion  
25 about the central office reorg plan?

1           A.     Was there discussion about the budget?

2           Q.     About the central office reorganization  
3 plan.

4           A.     I wouldn't remember. I don't remember  
5 back then what was discussed in that particular  
6 school board meeting. There's about 20 school board  
7 meetings a year, and I can't remember all of them.

8           Q.     Okay. Would it surprise you to know that  
9 in the transcript of the hearing, there is really  
10 very little, if none, discussion about the central  
11 office reorg plan?

12          A.     Surprise? I'm not sure I would  
13 characterize it that way. It's typical that the  
14 board goes through a lot of items. They have  
15 extensive discussion about budgets, and so in any  
16 one particular meeting, can't take into isolation,  
17 you have to take into consideration all the meetings  
18 that occurred so...

19          Q.     Did you know that the school board has to  
20 approve the elimination of a position?

21               MR. FOX: Objection to the form.

22               THE WITNESS: I'm not sure that's  
23 accurate.

24               BY MS. STEINER:

25          Q.     Why is that not accurate?

1 MR. FOX: Objection to the form.

2 THE WITNESS: I'm not sure what exactly  
3 their role is around there. The role of the school  
4 board, of course, is to approve the budget. I would  
5 imagine that we also wanted to be transparent and  
6 that's why this is in there.

7 BY MS. STEINER:

8 Q. Do you know whether or not there's a legal  
9 requirement that the school board approve the  
10 elimination of a position?

11 MR. FOX: Objection to the form.

12 THE WITNESS: I don't remember that  
13 specific requirement of not.

14 BY MS. STEINER:

15 Q. In the one-on-one meetings that Dr. Battle  
16 has with the school board members, have you ever  
17 attended one of those?

18 A. I don't -- no, I haven't.

19 Q. No, or you can't recall?

20 A. I cannot recall a specific time that I've  
21 joined them.

22 Q. Do you know whether or not in these  
23 meetings, would the school board members be allowed  
24 to ask questions about why particular positions are  
25 being eliminated?

1           A.     Yes.

2           Q.     And in these meetings, would the school  
3 board members be allowed to tell Dr. Battle either  
4 why or why not they would be for the plan?

5           A.     Would you say that again?

6           Q.     In these meetings, would the school board  
7 members be allowed to tell Dr. Battle what they  
8 actually think about the plan?

9           A.     I kind of -- the way that you're asking  
10 that doesn't make sense to me, because the school  
11 board members oversee the district, so we don't tell  
12 them what we allow or don't allow, so could a school  
13 board member express their thoughts on it? Yes,  
14 they could. That's their decision.

15          Q.     So a school board member in the private  
16 meeting with Dr. Battle then could say, I'm not  
17 approving this, or I am approving this and give the  
18 reasons to Dr. Battle?

19          A.     Generally, from my understanding of those  
20 meetings, it's a time to ask questions, have  
21 discussion about it, make sure that the information  
22 is clear. I'm not in them, so I don't know the  
23 extent to which they say approve or not approve.  
24 That's really a vote that they take on in the public  
25 meeting.

1           Q.    Now, this is one of the documents that we  
2 got that has anything about central office reorg  
3 plan on it.

4           A.    Okay.

5           Q.    And the defendant actually pointed us to  
6 these documents and said -- because we asked for the  
7 documents on central office reorg, but I want to  
8 show you one other, too.

9                   MS. STEINER:  And we're going to offer the  
10 school board minutes as Exhibit Number 3.

11                               (WHEREUPON, the  
12                               previously-mentioned document was  
13                               marked as Exhibit Number 3.)

14                   MR. FOX:  No objection.

15 BY MS. STEINER:

16           Q.    Can you see this?

17           A.    I can.

18           Q.    Good.  This is another document that was  
19 produced that we found.

20           A.    Okay.

21           Q.    It is Bates stamped MG 001350.  Do you  
22 recognize this document?

23           A.    It looks familiar.

24           Q.    Do you know who created this document?

25           A.    I don't know for sure.  Maybe Dr. Barnes,

1 the chief of human resources, or it came from his  
2 office. I can't remember precisely. Maybe Lisa  
3 Spencer from his office.

4 Q. So you think Ms. Spencer may have created  
5 that?

6 A. Maybe. I wouldn't have specific knowledge  
7 of it.

8 Q. Did you check this to see whether or not  
9 the information provided in this document is  
10 accurate?

11 A. I wouldn't have -- I would be relying on  
12 other people to provide the information. I probably  
13 checked it against my general knowledge, but I would  
14 have knowledge, for example, of the people's  
15 benefits, et cetera.

16 MS. STEINER: Could we have this marked  
17 Exhibit Number 4 to your deposition?

18 MR. FOX: No objection.

19 (WHEREUPON, the  
20 previously-mentioned document was  
21 marked as Exhibit Number 4.)

22 MR. FOX: Ms. Steiner, it's been about an  
23 hour and a half.

24 MS. STEINER: If you need to take a break,  
25 that's fine.



1           MR. FOX: If you're changing to another  
2 exhibit, I thought maybe it's a good time.

3           MS. STEINER: We'll take a break. I  
4 didn't mean if you need to take a break. We can  
5 take a break. Sorry.

6           (Brief break observed.)

7 BY MS. STEINER:

8           Q. Mr. Clay, so then you were actually  
9 consulting with and advising Dr. Battle about the  
10 elimination of the associate superintendent  
11 positions?

12          A. Yes.

13          Q. And it's my understanding from your  
14 testimony, that you did not know the information  
15 that the executive directors would provide to those  
16 associate superintendents?

17          A. That's contract.

18          Q. And you do not know the information that  
19 the associate superintendents would provide to Dr.  
20 Battle?

21          A. And to further give specifics, I wouldn't  
22 know the full information. There's some of the  
23 information I would know, of course.

24          Q. Such as?

25          A. Such as information that they presented

1 during cabinet meetings, information that might come  
2 to my attention, nothing -- nothing regular. I was  
3 not in their chain of command.

4 Q. And you do not know what the executive  
5 directors provide now to Mason Bellamy, correct?

6 A. Correct.

7 Q. Okay. And you don't know the information  
8 Mason Bellamy provides to Dr. Battle?

9 A. Not the full extent.

10 Q. Can you tell me why -- did you advise her  
11 to eliminate those positions?

12 A. Advise -- yes.

13 Q. Why?

14 A. As I believe we answered earlier, it's a  
15 combination between the budget and the efficiencies  
16 of operations.

17 Q. Would you have eliminated those positions,  
18 associate superintendent positions in the spring of  
19 2020 if you did not have a budget issue?

20 A. Perhaps, but that's a hypothetical  
21 situation that -- we weren't in that situation. We  
22 were in the budget crisis that we were in.

23 Q. So there's a chance then that those  
24 positions would not have been eliminated if you did  
25 not have the budget problems?

1 A. There's a chance for anything.

2 MR. FOX: Objection to the form.

3 THE WITNESS: Yes, that's possible, but  
4 our plan was to eliminate those positions.

5 BY MS. STEINER:

6 Q. Now, can you tell me, X-ing out the  
7 budget, give me the other reason why the associate  
8 superintendent positions were eliminated.

9 A. We eliminated those positions because we  
10 wanted to have a more streamline form of  
11 communication from the school principal through the  
12 director of schools. We also wanted a more  
13 consolidated strategic way of aligning both the  
14 academics and the school supervision.

15 Q. What was the second part again?

16 A. A more streamlined -- a more strategic way  
17 of integrating both the academic side of the house  
18 with the school supervision, so the curriculum with  
19 those who would be implementing the curriculum.

20 Q. Now, in everyday language, what do you  
21 mean?

22 A. What I mean is, we want principals who are  
23 responsible for educating students and implementing  
24 curriculum to have an alignment between their  
25 ultimate supervisor being over both the curriculum

1 and the school supervision.

2 Q. What's the difference between curriculum  
3 and school supervision?

4 A. So curriculum is what they teach, school  
5 supervision would be the person's direct support,  
6 boss, the line of command.

7 Q. So you want the principals to have an  
8 alignment with what they teach and who they report  
9 to?

10 A. That's accurate.

11 Q. Is that correct? Is that what you're  
12 saying?

13 A. Yes.

14 Q. Okay. So the principals, what they teach  
15 did not change any in the school years, correct?

16 A. No, that's not accurate at all. In the  
17 current school year, we implemented an entire --  
18 well, in the 2020/2021 school year during that  
19 pandemic, the year we've been talking about most of  
20 the time, we had the adoption of virtual learning, a  
21 new curriculum through that, entirely new way of  
22 operating and delivering that curriculum.  
23 Basically, through that pandemic, everything  
24 changed.

25 Q. Okay. Now, the principals --

1           A.     In addition to that, now we're also  
2 building toward literacy adoption, which had been  
3 scheduled for that year, '20/'21, and then they had  
4 to freeze that because of the pandemic and that is  
5 being implemented at the current year.

6           Q.     Okay. The principals in 2020 reported to  
7 the executive directors, correct?

8           A.     That's correct.

9           Q.     With regard to what they taught, correct?

10          A.     With -- say that again.

11          Q.     Okay. The principals, you said you wanted  
12 them to have something with regard to who they  
13 report to to align with regard to what they teach  
14 and who their boss was.

15          A.     Uh-huh.

16          Q.     So in the spring of 2020, their boss was  
17 the executive directors, correct?

18          A.     Yeah. To clarify, my comment was we  
19 wanted -- we separately, under the previous  
20 administration, and up to that point, had a separate  
21 chief of academics and a chief of schools. At that  
22 point, they also had the extra bureaucracy of a  
23 whole 'nother layer between the chief of schools and  
24 the executive directors, and then the principals.  
25 We were trying to, for a variety of reasons, to

1 streamline that for information purposes for each,  
2 so you would have those who are directing the  
3 curriculum under the chief of academics, and then  
4 separately the principals' actual supervisors were  
5 the executive directors. That has remained  
6 consistent, to your question, but it is now that  
7 person reports to the -- to those who also oversee  
8 the curriculum.

9 Q. Chief of academics handles the curriculum?

10 A. Correct. It did back then.

11 Q. Chief of schools handles what?

12 A. Principal supervision. So deciding who  
13 principals are.

14 Q. And in the spring of 2020, you did not  
15 have a chief of academics, correct?

16 A. No, that's not correct. We had an interim  
17 chief of academics.

18 Q. Interim. But you did not have a chief of  
19 schools?

20 A. That is correct.

21 Q. So then in terms of academics or  
22 supervisors, the executive directors were out of it  
23 because the principals reported to either the chief  
24 of academics or the chief of schools? Is that what  
25 you're telling me?

1           A.    No.  That wouldn't be -- that would not be  
2   an accurate description.  So first of all, we're all  
3   one organization.  It's Metro Nashville Public  
4   Schools.  There are a variety of departments.  And  
5   the education delivered by an individual teacher to  
6   a classroom full of kids, that teacher reports to  
7   either an assistant super -- excuse me, assistant  
8   principal or principal who reports to the executive  
9   director who reports at that time to the community  
10  superintendent, associate superintendent who  
11  reported to a vacant position, then Dr. Battle.  The  
12  --

13           Q.    Okay.  So then, let me stop you there.  
14  The principals actually would report to the  
15  executive directors?

16           A.    Yes.

17           Q.    And today, the principals report to the  
18  executive directors?

19           A.    That is accurate, but the executive  
20  directors report to a person that aligns the  
21  curriculum instruction with it.  So that's unified  
22  and --

23           Q.    And the chief of academics was who?

24           A.    Interim chief of academics was Dr. David  
25  Williams.

1 Q. Who is the chief now?

2 A. Well, those are combined positions as we  
3 are trying to create efficiencies, and it's  
4 Dr. Mason Bellamy, as chief of academics and  
5 schools. It's a combined position.

6 Q. Okay. And do the principals report to the  
7 executive directors, the executive directors report  
8 to Mason?

9 A. That's accurate.

10 Q. Do the executive directors report to Mason  
11 any different information than what they reported to  
12 the associate superintendents in the spring of 2020?

13 A. As I said before, I don't know all the  
14 information that they presented to the former --  
15 probably depends on style of -- the previous  
16 associate superintendents may not have asked for the  
17 same kind of information that the new chief of  
18 academics and schools does.

19 Q. Can you tell me specifically why it's  
20 better to have them reporting to one person as  
21 opposed to four?

22 A. Yeah. When you think about, we're trying  
23 to impact what is happening in the classroom, so we  
24 have a way of offering to try to remove as many  
25 layers as possible between those two, and so the



1 chief of academics and schools now has direct --  
2 there's only one layer between the principal and the  
3 chief of academics and schools, so it's way easier  
4 to communicate that information. You don't have  
5 four -- you don't have the variance of four  
6 different people trying to influence, you know,  
7 goodness, about 15 executive directors, but you're  
8 also, Ms. Steiner, trying to -- I want to make sure,  
9 can you hear what I'm saying?

10 Q. Hang on a second. Go on. Go on.

11 A. So you also don't want the -- you want the  
12 principals to have individualized level of support.  
13 That's why it's important to have, you know, as many  
14 executive directors as we do.

15 Q. Did you, when you were advising Dr.  
16 Battle, talk to any of the associate superintendents  
17 about what their job duties were and how it could be  
18 streamlined?

19 A. No. That would have been unnecessary.  
20 Dr. Battle was one of them immediately prior to  
21 becoming superintendent.

22 Q. What did Dr. Battle tell you about  
23 streamlining the associate superintendent jobs out?

24 A. She talked about the same things I just  
25 referenced, that it's really important for the

1 principals to have as direct of a connection, all  
2 the things I just told you about.

3 Q. But the principals are still reporting to  
4 the executive directors?

5 A. Who have a fewer layer between them and  
6 the chief of academics and schools.

7 Q. Did she give you any other information  
8 other than the teachers, the principals have a  
9 direct out?

10 A. I mean, I just gave you a whole bunch of  
11 information. So she talked about -- I'm trying to  
12 remember all of the things. So one, it being clear,  
13 we are trying to be very consistent in our schools  
14 to make sure that there is a very high level of  
15 service for each of the students. And so it was  
16 much easier to do that between the chief of  
17 academics and schools talking directly to the  
18 principal supervisor.

19 Q. Talking directly to the executive  
20 director?

21 A. Which is a principal supervisor.

22 Q. Okay. And did Dr. Battle give you any  
23 reason why the executive directors could not speak  
24 to the director of schools, who would have been  
25 David Williams, in the spring of 2020?

1           A.     I assume you mean the interim chief of  
2 academics?

3           Q.     Yes.

4           A.     Why -- no, again, we're one organization.  
5 We all talk all the time. Our effort was to try to  
6 make it even more collaborative, even more  
7 streamline.

8           Q.     Hang on a second. Here is a chart that's  
9 been produced. Its got MG 001057 at the bottom of  
10 the page.

11          A.     Repeat the numbers again.

12          Q.     MG 001057.

13          A.     I see that.

14          Q.     And it is the org chart, and it looks like  
15 it's January 20th -- January 2020; is that correct?

16          A.     I see that at the bottom, right.

17                 MS. STEINER: And we're going to offer  
18 this as Exhibit Number 5, and I think I've offered  
19 Number 4, correct?

20                         (WHEREUPON, the  
21                         previously-mentioned document was  
22                         marked as Exhibit Number 5.)

23                 MS. STEINER: Okay. It's going to be  
24 offered as Exhibit Number 5 to this deposition  
25 today.

1 MR. FOX: No objection.

2 BY MS. STEINER:

3 Q. And if you can see here, the executive  
4 directors are reporting to the associate  
5 superintendents.

6 A. Uh-huh.

7 Q. And they are reporting to Dr. Battle, and  
8 the chief academic officer is reporting to Dr.  
9 Battle, correct?

10 A. The interim chief academic officer is  
11 reporting to Dr. Battle, and the associate  
12 superintendents on this org chart are reporting to  
13 Dr. Battle; however, it doesn't include the vacant  
14 position which would be in between the  
15 superintendents and Dr. Battle.

16 Q. Did you have any discussions with Dr.  
17 Battle about just filling the vacant position?

18 A. And not reducing that --

19 Q. Yes.

20 A. Of course, that was included.

21 Q. Why did you do that?

22 A. Why did I do what?

23 Q. Why didn't you just fill the vacant  
24 position?

25 A. For the reasons that I have spent a good

1 bit of time. I'll be glad to repeat explaining,  
2 and -- yeah, that's why.

3 Q. Were the teachers not having, and the  
4 principals not having a clear consistent high level  
5 of service in the spring of 2020?

6 A. We felt that it could be higher. We're  
7 always trying to improve.

8 Q. Why did you feel what way?

9 A. Why did I -- let's see. We felt like  
10 there could be a clearer line of communication  
11 between a combined role of chief of academics and  
12 schools to the executive directors to the  
13 principals. It just removes -- you know, it's like  
14 the childhood game of telephone, it removes the  
15 ability for some people to correctly get the  
16 information or lack of consistency.

17 Q. Was there any problems, lack of  
18 consistency, and do you know what that was?

19 A. I would have to defer to Dr. Battle on  
20 that.

21 Q. Okay. With regard to the information  
22 coming over wrong, do you know what that was?

23 A. Say it again.

24 Q. Information was being given wrong,  
25 incorrectly, do you know what that was?

1           A.     I don't have like a specific example off  
2 the top of my head.

3           Q.     Do you have any notes that say, we are  
4 going to have to eliminate these positions because  
5 there's a lack of inconsistency and some of the  
6 information is being given wrong?

7           A.     No.   That would just be general knowledge.

8           Q.     Okay. Did Dr. Battle give you specifics  
9 of any information being given wrong?

10          A.     I'm trying to recall. I can't think of a  
11 good example off the top of my head two years later.

12          Q.     This is your deposition, and it's the only  
13 time I have to question about this. Did you prepare  
14 for this deposition?

15          A.     Yes.

16          Q.     Did you look at any documents?

17          A.     I looked at my calendar to remind myself  
18 of the dates.

19          Q.     Anything else?

20          A.     No.

21          Q.     Okay. Did you look at any notes?

22          A.     No.

23          Q.     You didn't have any notes?

24          A.     That's right.

25          Q.     Okay. Did you know that -- did you know

1 that Dr. Battle had a brother, Coach Battle?

2 A. Do I know that she has a brother, Coach  
3 Battle, yes.

4 Q. Did you know he worked for Metro Schools?

5 A. I do know that.

6 Q. Did you know he lost his job with Metro  
7 Schools?

8 A. I do know that.

9 Q. Did you know he lost his job for getting  
10 in a fight with a parent?

11 A. I did not know that.

12 Q. Did you know he lost his job for  
13 mishandling funds?

14 A. I did not know that.

15 Q. Did you know that he's trying to come back  
16 to work for Metro Schools?

17 A. I did not know that.

18 Q. Did you know that Pippa Meriwether was the  
19 superintendent over the principal who made the  
20 decision to fire Coach Battle, non-renew his  
21 contract?

22 A. I believe that you say that. That was  
23 when I was not with the district.

24 Q. Did you know that when you eliminated  
25 Pippa Meriwether's job that she was a superintendent

1 who approved Dr. Bailey's decision to non-renew  
2 Coach Battle's brother -- or Coach Battle?

3 A. I believe you when you say it, but, no, I  
4 wasn't in the district when that happened.

5 Q. Did you know it in the spring of 2020 that  
6 this had occurred?

7 A. Did I know about Dr. -- about Coach  
8 battle?

9 Q. Yes.

10 A. I'm trying to remember when I knew that.  
11 I don't think -- again, I don't -- I believe you  
12 when you're telling me that Pippa was -- Dr.  
13 Meriwether was over the principal who did it, but I  
14 wasn't with the district at the time, so I can't --

15 Q. I'm not asking about that time, I'm asking  
16 you in the spring of 2020, did you know that Pippa  
17 Meriwether was involved in the decision to non-renew  
18 Coach Battle?

19 A. I believe you, but I don't know that. The  
20 reason I'm saying that is because I would assume  
21 human resources would have been involved, I assume  
22 the superintendent. I believe they had a chief of  
23 schools at the time. I don't know the extent to  
24 which Dr. Meriwether was overseeing that school at  
25 the time. I just -- I wasn't around. I don't know



1 that answer. I did not know it at the time.

2 Q. Did you know Dr. Bailey was the principal  
3 over Coach Battle?

4 A. Did I -- yeah, because he was at White's  
5 Creek and that was the principal at White's Creek,  
6 right?

7 Q. Yes.

8 A. I believe you.

9 Q. Okay. Did you know that the principal  
10 would be the person responsible for non-renewing a  
11 teacher or a coach under him, correct?

12 A. I don't -- I'm not on the HR side, so I'm  
13 a little fuzzy. I want to make sure I'm really  
14 specific. I would imagine that a principal was  
15 involved. I don't know whether technically the  
16 super -- the director of schools who non-renews or  
17 whether technically it's HR, so I can't answer  
18 precisely what you're saying. I do know that he was  
19 a principal at the time.

20 Q. Do you know whether or not he would have  
21 any input into the decision to non-renew a teacher  
22 under him?

23 A. I wasn't -- I mean, I don't have any  
24 direct knowledge of that.

25 Q. Okay. Let's ask you this then, what about

1 Renita Perry, would she have any input over the  
2 decision to non-renew Dr. Bailey?

3 A. I don't know when she came to the  
4 district.

5 Q. Assuming that she was over Dr. Bailey at  
6 the time, he was non-renewed, would Renita Perry  
7 have had any input into that?

8 A. As executive director?

9 Q. Yes.

10 A. I'm not sure when she came to the  
11 district. I don't know who was overseeing her at  
12 the time. If you're telling me that an executive  
13 director was over the -- that she was the executive  
14 director over Dr. Bailey at the time, I would hope  
15 that she would have some input in it, but I just --  
16 I wasn't in the district and I don't know the answer  
17 to that.

18 Q. Would you have hoped Dr. Bailey would have  
19 had some input over non-renewing Coach Battle?

20 A. Input?

21 Q. Yes.

22 A. I would assume that a principal would have  
23 some sort of input into the teachers at his or her  
24 school.

25 Q. Did you know Schunn Turner had complained

1 about disparity in pay, that the females weren't  
2 making as much as the males?

3 A. Are you talking about Dr. Schunn Turner?

4 Q. Yes.

5 A. Just to make sure I'm clear. Yes, I  
6 believe that that was a lawsuit that she had with  
7 the previous superintendent.

8 Q. Did you know about that when her position  
9 was eliminated?

10 A. Yes.

11 Q. Okay. Did you know that Damon Cathey had  
12 complained about falsification of grades?

13 A. No.

14 Q. Did you know that Damon Cathey had been  
15 questioned by Dr. Battle about why -- whether Lily  
16 Leffler was loyal to the schools?

17 A. No.

18 Q. Did you know who Lily Leffler was?

19 A. That she was an executive director?

20 Q. Yes.

21 A. Yeah.

22 Q. Did you ever hear any complaints about her  
23 job performance?

24 A. That wouldn't be something I'm involved  
25 with, and, no is the answer.

1 Q. Okay. In the reorganization that was  
2 discussed, did you ever hear anything about Lily  
3 Leffler's job performance?

4 A. No.

5 Q. Okay. Did you know that Lily Leffler was  
6 kin to Vanessa Garcia?

7 A. I have since found that out, yes.

8 Q. When you say "since," what do you mean?  
9 What's the time limit on that?

10 A. I really don't know when I came to that  
11 information. Maybe -- maybe when Dr. Garcia talked  
12 about it. I'm sorry, I just don't have a time  
13 reference on that.

14 Q. Who told you about it?

15 A. Maybe T.C. Weber who was a community  
16 member.

17 Q. Do you ever talk to T.C. Weber?

18 A. T.C. Weber?

19 Q. Uh-huh.

20 A. Yes. On occasion, I talk to him.

21 Q. Do you talk to him a lot, pass on  
22 information to him?

23 A. No.

24 Q. Do you have any idea who his source is?

25 A. For what?

1 Q. For his information on Dads Gone Wild?

2 A. No, I don't know.

3 Q. Okay. Did you know Jane Doe had made a  
4 Title VI complaint against the school system?

5 A. Did I know -- say that again.

6 Q. Did you know Jane Doe had made a complaint  
7 about that lesson taught at Waverly Belmont called,  
8 How to Make a Slave?

9 A. I know that a Jane Doe did, yes.

10 Q. Did you know about that when her position  
11 was being eliminated?

12 A. Whose position?

13 Q. Jane Doe's as executive director of school  
14 choice?

15 A. So I want to be really precise --

16 MR. FOX: Objection to the form.

17 THE WITNESS: So I know that a Jane Doe  
18 brought a case about the Waverly Belmont. I did not  
19 know at the time who that Jane Doe was.

20 BY MS. STEINER:

21 Q. Did you know -- did you hear about the  
22 lesson, How to Make a Slave?

23 A. Yes.

24 Q. Did you know that a parent, who is also a  
25 teacher, complained about that?

1           A.     No, I did not know that.

2           Q.     Did you know that Jane Doe complained  
3 about that lesson when it occurred because her son  
4 was in that classroom?

5           A.     I'm not sure at the time, I do know that  
6 Jane Doe did, I think file a lawsuit, I believe  
7 that's the correct term.

8           Q.     Did you know that she had complained about  
9 that at all in the spring of 2020?

10          A.     No.

11          Q.     Okay. Do you know what it means to punk  
12 somebody? Have you ever heard that term?

13          A.     I think I've heard that term.

14          Q.     What does what mean?

15          A.     I would assume prank them. Prank them  
16 would be I guess how I would describe it.

17          Q.     Prank them?

18          A.     Uh-huh.

19          Q.     Did you hear Dr. Battle make any comments  
20 about, nobody is going to punk her brother?

21          A.     No. I've never heard that.

22          Q.     Okay. Have you heard Dr. Battle talk at  
23 all about her brother?

24          A.     Yes.

25          Q.     What does she say?

1           A.     That she's obviously his sister, that  
2 she -- that he went on to be a coach at another  
3 school, and that he -- I've heard a good bit from  
4 the deputy mayor about just -- community members  
5 about him being a good coach. That's about the  
6 extent of it.

7           Q.     Where is he coaching?

8           A.     I'm not sure.

9           Q.     Is it in a Metro school?

10          A.     No.

11          Q.     Did you know that --

12          A.     Well, let me -- I'm not sure where he is  
13 coaching. If you're asking, is he at a district-run  
14 school, I'm almost sure that's not the case.

15          Q.     Okay. Is a charter school district-run?

16          A.     No, it's not.

17          Q.     Okay. Is a charter school connected to  
18 Metro schools, though?

19          A.     It depends. Some charter schools are  
20 approved by the school board and they've part of the  
21 school district, some charter schools are approved  
22 by the state board, and then the school board  
23 invites them back in and they're part of the  
24 district. Some charter schools are appealed -- are  
25 denied by the local school board, appealed to the

1 state school board, and then the local school board  
2 does not invite them to be back part of it. And,  
3 now, there are some charter schools that apply to  
4 the state commission and can take either of those  
5 two paths.

6 Q. What did the deputy mayor say about Coach  
7 Battle?

8 A. That he had coached her son and that he  
9 was a really great coach.

10 Q. Okay. Do you think a coach that beats up  
11 a parent would be a really great coach?

12 A. I have no idea about --

13 Q. Do you think a coach who misuses funds  
14 would be a really great coach.

15 A. I have no idea about the specifics of any  
16 of this.

17 Q. Do you know whether or not Coach Battle  
18 has tried to work for Metro Schools again?

19 A. I believe that he has.

20 Q. How do you know that?

21 A. Well, let me -- would you rephrase your  
22 question again?

23 Q. Did you know that Coach Battle has tried  
24 to work for Metro Schools again?

25 A. I don't know the precise answer to that



1 question. I believe that, and I don't know the  
2 nature of whether he was asked to apply or what, but  
3 I believe that he applied or that he was in the  
4 consideration for Pearl-Cohn High School, but I  
5 don't get into the specifics on coaches, I just  
6 heard that.

7 Q. Who did you hear it from?

8 A. Mark North.

9 Q. And do you know when you are non-renewed,  
10 your contract is non-renewed, are you eligible for  
11 rehire?

12 A. Depends on the situation.

13 Q. Do you know whether or not Coach Battle  
14 was eligible for rehire?

15 A. I don't know.

16 Q. Do you know whether or not his designation  
17 needed to be changed before he could be considered  
18 for Pearl-Cohn?

19 A. I don't know.

20 Q. Was he considered for Pearl-Cohn sometime  
21 after the spring of 2020?

22 A. I don't know the timeline on it.

23 Q. So then I take it then at Metro Schools,  
24 it's okay if you have coaches that beat up a parent?

25 A. No, I wouldn't --

1 MR. FOX: Objection to the form.

2 THE WITNESS: I would never ever phrase  
3 something like that. You're asking the question, do  
4 I know about any specifics? No, I don't know.

5 BY MS. STEINER:

6 Q. Do -- when you say he was in the  
7 consideration for it, do you know whether or not he  
8 interviewed for the position?

9 A. I don't know.

10 Q. Do you know whether or not he was asked to  
11 come in to interview for that job?

12 A. No, I don't know.

13 Q. But Mark North is the one that told you  
14 this?

15 A. Yes.

16 Q. Okay. Now, did you have any discussions  
17 with Dr. Battle -- let me back up just a second.  
18 When she's meeting with the school board members,  
19 did she ever meet with several at the same time?

20 A. No, that's against -- no, is the answer.  
21 And because that's against state law.

22 Q. But she would meet with each one  
23 individually.

24 A. Sorry. Let me correct that.

25 Q. Uh-huh.

1           A.     So she almost always met with them  
2 individually. She -- there were a couple of  
3 occasions during emergency situations where she had  
4 one-way calls with several of them so that -- the  
5 state law means that they can't communicate with  
6 each other in a non-public meeting. But she was  
7 providing information to all of them at the same  
8 time, but they couldn't communicate with each other  
9 about it.

10          Q.     But they could communicate with her?

11          A.     Right.

12          Q.     And she could communicate with the other  
13 board members?

14          A.     Rephrase your question.

15          Q.     There were no prohibitions on what Dr.  
16 Battle would tell the other board members?

17          A.     Yeah, that's correct.

18          Q.     So if one board member tells her, I'm  
19 voting for this because of X, Y and Z, Dr. Battle  
20 has no prohibition on contacting another board  
21 member and saying, Jane over here is going to vote  
22 for this based on X, Y and Z?

23          A.     That's a hypothetical that I've never seen  
24 occur.

25                 MR. FOX: Objection to the form.

1           THE WITNESS: If you're talking about like  
2 can she legally -- is she legally able to do that, I  
3 don't know the answer to that. That's not something  
4 she does.

5 BY MS. STEINER:

6           Q. What parameters are put on Dr. Battle that  
7 you know of that's in policy or anything else that's  
8 written down and says, you cannot tell a board  
9 member X, Y or Z; is there anything?

10          A. I'm not aware of anything like that.

11          Q. Okay. So what Dr. Battle does --

12          A. I would elaborate on that. I'm not aware  
13 of anything like that because we follow what's in  
14 state law. I don't think there's anything in state  
15 law that would speak to that.

16                 If you're talking about practice, I'm not  
17 aware of any practice that she's ever had of talking  
18 to other school board members about how other school  
19 board members plan to take action.

20          Q. But routinely she talks to the school  
21 board members about the items that are appearing  
22 before them, correct?

23          A. She routinely -- yes, to answer questions  
24 they may have to clarify information, to make sure  
25 that we are prepared to have the information at the

1 school board meeting if they were to ask about that  
2 on the board floor, yes.

3 Q. And what protection, what parameters are  
4 put around Dr. Battle to make sure that she doesn't  
5 cross any lines with regard to what she says or  
6 doesn't say to the school board members?

7 A. I'm not sure what lines you might be  
8 referring to, because I'm not aware of anything in  
9 state law about that, so that question doesn't make  
10 sense to me.

11 Q. Well, is it legal for Dr. Battle to talk  
12 to one board member, find out what the board member  
13 is going to vote, and then go to another board  
14 member and tell them?

15 MR. FOX: Objection to the form.

16 BY MS. STEINER:

17 Q. Is that legal?

18 A. I'm not an attorney, so I can't say  
19 whether that's legal or not. I'm not aware of  
20 anything that would prohibit it, but it's not part  
21 of our practice.

22 Q. Were you told at all that three of these  
23 associate superintendents -- let me strike that.  
24 Let me go back a second. Are you aware that if  
25 someone complains of discrimination, they're

1 protected under the retaliation provisions?

2 A. I have some general knowledge of it. I'm  
3 not an expert at it.

4 Q. And are you aware that there is also  
5 whistleblower laws that when someone refuses to do  
6 something or report something that they think is  
7 illegal, they're protected under the law?

8 A. I'm not aware of the full extent of it,  
9 but I believe what you're saying.

10 Q. Did you know in the spring of 2020, that  
11 Dr. Battle considered three of the associate  
12 superintendents to be in a protective category, and  
13 that would be Damon Cathey, Pippa Meriwether and  
14 Schunn Turner?

15 MR. FOX: Objection to the form.

16 BY MS. STEINER:

17 Q. Did you know what?

18 A. What protected category?

19 Q. Do you know that she considered Schunn  
20 Turner to be protected because she complained of  
21 disparities in pay?

22 MR. FOX: Objection to the form.

23 THE WITNESS: No, I wouldn't be aware of  
24 that.

25 BY MS. STEINER:

1 Q. Did you know that Metro schools was  
2 prohibited by law from retaliating against Schunn  
3 Turner for her complaints of disparity in pay?

4 A. I believe you, but I'm not aware of any  
5 retaliation.

6 Q. Were you aware that Schunn Turner was  
7 eliminated from her position as an associate  
8 superintendent?

9 A. Yes.

10 Q. Were you aware that Pippa Meriwether was  
11 eliminated from her position?

12 A. Yes.

13 Q. Were you aware that three of the four  
14 superintendents Dr. Battle considered to have  
15 engaged in protected activity?

16 MR. FOX: Objection to the form.

17 THE WITNESS: What protected -- so, no, is  
18 the answer. What protected activity for the other  
19 two?

20 BY MS. STEINER:

21 Q. Let me stop you on that. Did you know  
22 that Dr. Battle considered Dr. Meriwether to be  
23 protected because of the actions she took in her  
24 brother's situation?

25 A. I'm not --

1 MR. FOX: Objection to the form.

2 THE WITNESS: No, I'm not aware of that.

3 BY MS. STEINER:

4 Q. If you are being asked to consult with Dr.  
5 Battle about the elimination of positions, do you  
6 think it would have been fair to tell you three of  
7 these positions that she wants to eliminate? Three  
8 of the individuals who are in the positions she  
9 wants to eliminate. There's four in the position,  
10 she wants to eliminate all four, three of those  
11 people, 75 percent of the people had engaged in her  
12 mind in protective activity?

13 MR. FOX: Objection to the form.

14 BY MS. STEINER:

15 Q. Do you think she should have told you  
16 that?

17 A. So it's related to the positions, not the  
18 people?

19 Q. Uh-huh.

20 A. So I don't understand your question.

21 Q. If you are being consulted about should  
22 she or should she not eliminate the associate  
23 superintendent positions --

24 A. Uh-huh.

25 Q. You know there are four of them --



1 A. Uh-huh.

2 Q. -- do you think Dr. Battle should have  
3 told you that she considered three to have engaged  
4 in protected activity?

5 MR. FOX: Objection to the form.

6 THE WITNESS: I'm not sure I understand  
7 all the protected activity. If I'm just answering  
8 myself, it seems like if we were to be discussing  
9 individuals instead of the position, that would  
10 be -- we're not talking about individuals, you're  
11 talking about the position so I don't --

12 BY MS. STEINER:

13 Q. Okay. I just want to know your opinion.  
14 Do you want to know this or don't you want to know  
15 this? Okay. You're being asked your opinion about  
16 whether or not to eliminate the associate  
17 superintendent's jobs, okay?

18 A. So, that, to me --

19 Q. And you're asking -- they're asking you  
20 for your opinion on that, do you think it's fair, do  
21 you think it's right for the person asking you that  
22 to say, oh, by the way, three of these four have  
23 engaged in protected activity, or is that something  
24 you just don't even care about?

25 MR. FOX: Objection to the form.

1           THE WITNESS: That's just -- the phrasing  
2 of that just doesn't make sense, because we're  
3 talking about the positions, not the people, so the  
4 people in them --

5 BY MS. STEINER:

6           Q. Don't matter?

7           A. -- aren't relevant to the conversation.

8           Q. The people in them lose their jobs,  
9 correct?

10          A. Our job is to protect the interest of the  
11 students. That was not in our strategic -- for all  
12 the reasons I explained earlier, that position was  
13 not necessary to achieve any of the objectives we  
14 were trying to seek.

15          Q. I would really like to know this. If  
16 you're asked to fire someone, if you were asked to  
17 fire someone by somebody else, would you not think  
18 it's fair to know whether or not the person may have  
19 done something that would cause the other person to  
20 want to retaliate?

21          A. I wasn't asked to fire anyone.

22          Q. I'm just asking you that. In general, if  
23 you were asked to fire somebody, would you not want  
24 to know whether or not the person has done something  
25 that somebody else may want to retaliate against

1     them for?

2           A.     If I'm in a position where I'm their  
3     supervisor and therefore would be in a position to  
4     fire them, then I would expect that I would probably  
5     already know that, so that question just doesn't  
6     make sense to me.

7           Q.     Schunn Turner, let's just talk about  
8     Schunn Turner, okay?

9           A.     By the way, it's Dr. Schunn Turner.

10          Q.     Schunn Turner.

11          A.     Yeah.

12          Q.     Do you think that it would be fair to fire  
13     her for her complaints of pay disparity?

14          A.     No.

15          Q.     Do you think it would be fair to eliminate  
16     her position after she has made a complaint of pay  
17     disparity?

18          A.     That -- those are disconnected.

19          Q.     Okay. Did you know that by law they can  
20     be connected?

21          A.     I believe you.

22                 MR. FOX: Objection to the form.

23     BY MS. STEINER:

24          Q.     Can you -- do you know that a person may  
25     want to retaliate against someone and they feel like

1 the easiest way to do it is to eliminate their  
2 position?

3 MR. FOX: Objection to the form.

4 THE WITNESS: No. Those are all the  
5 hypothetical situations that...

6 BY MS. STEINER:

7 Q. Now, do you think Dr. Battle should have  
8 told you that three of these -- and if the answer is  
9 no, say it, okay? Do you think Dr. Battle should  
10 have told you that three of these associate  
11 superintendents whose jobs she eliminated, she  
12 considered to have engaged in protected activity?

13 MR. FOX: Objection to the form.

14 THE WITNESS: We were talking about the  
15 position themselves, so...

16 BY MS. STEINER:

17 Q. Is that a no.

18 A. We were talking about the position itself.

19 Q. Do you think, yes or no, that Dr. Battle  
20 should have told you that three of the four  
21 associate superintendents had complained about --  
22 had engaged in protected activity?

23 MR. FOX: Objection to the form.

24 THE WITNESS: We were --

25 BY MS. STEINER:

1 Q. It's yes, no. Just yes or no.

2 A. It doesn't make sense to the situation  
3 that we're -- we're talking about positions.

4 Q. Okay. Okay. Now, going to ask you this  
5 one more time, and if you don't understand it,  
6 that's fine. We'll go with that record when we try  
7 the case, okay? But do you think Dr. Battle should  
8 have told you that three of these four associate  
9 superintendents had engaged in protected activity in  
10 her mind?

11 MR. FOX: Objection to the form.

12 THE WITNESS: We were looking at  
13 positions, not people, so I just don't understand  
14 how that's relevant.

15 BY MS. STEINER:

16 Q. Do you understand whether or not -- can  
17 you answer that yes or no?

18 A. Do I understand the question?

19 Q. Can you answer that yes or no? Do you  
20 think that's important for you to know? If it's no,  
21 that's fine.

22 A. It just is irrelevant to the situation.

23 Q. It's irrelevant. Okay. Now, executive  
24 directors --

25 A. Uh-huh.

1 Q. -- those positions were not eliminated,  
2 correct?

3 A. That's correct.

4 Q. They stayed in the budget, correct?

5 A. That's correct.

6 Q. And can you tell me why you hired two new  
7 executive directors? Did you know they went from 13  
8 to 15?

9 A. I'm trying to remember. I think -- yes, I  
10 can answer that.

11 Q. Why?

12 A. I believe that we were trying to have  
13 support positions, because we want to make it as  
14 easy as possible for the principals to focus on  
15 educating the students, and so we have executive  
16 directors who were overseeing a large number of  
17 schools, kind of the instructional supervision of  
18 them, and then we had a different set of executive  
19 directors that were there to help ensure that the  
20 operational needs of the schools were supported in a  
21 really easy way so the principal can keep on doing  
22 his or her job.

23 Q. The new ones, what did they do?

24 A. So you're getting a little outside of my  
25 specific wheelhouse. I believe what you're talking

1 about during this timeline was the support  
2 positions, that they would be there to help support  
3 the schools in the way I just described.

4 Q. Okay. And so you added two new ones that  
5 were doing different job duties, support for the  
6 schools, correct?

7 A. I believe that's correct.

8 Q. And the other executive director stayed  
9 the same, correct?

10 A. In general, I think there was a few tweaks  
11 here and there, and I believe some people retired.

12 Q. Okay. Now, do you know why Lily Leffler  
13 was not interviewed for an executive director's  
14 position?

15 A. I wasn't aware that she wasn't  
16 interviewed.

17 Q. Do you know why she wasn't hired as an  
18 executive director?

19 A. No, I don't know. I think you just said  
20 she didn't interview for the position.

21 Q. She wasn't interviewed.

22 A. I don't know. I believe what you're  
23 telling me, but I don't know.

24 Q. Did you know that the defendant claimed  
25 that you were the decision-maker with regard to the

1 executive directors?

2 A. No. That doesn't make sense.

3 MR. FOX: Objection to the form.

4 BY MS. STEINER:

5 Q. Okay. Let me hand you this. I have some  
6 hard copies of some things. Were you the hiring  
7 manager for the -- hang on a second.

8 Okay. But you were -- it seems like to  
9 me, as chief of staff, you were probably the main  
10 one talking to Dr. Battle about the reorg, as  
11 opposed to someone else, correct?

12 A. Yes.

13 Q. Okay. And that's your duty, correct?

14 A. Yes.

15 Q. Now, did you know that Jane Doe applied  
16 for the position of -- well, the job that Ashford  
17 Hughes got?

18 A. The executive officer for diversity,  
19 equity inclusion?

20 Q. Yes.

21 A. Did I know that -- and to clarify, are we  
22 talking about -- I think we referred to two  
23 different Jane Doe earlier -- Jane Does earlier.

24 Q. There's only one Jane Doe.

25 A. Okay. You're telling me that, so am I



1 aware that who you referred to at the beginning of  
2 the deposition about a specific name applied for  
3 that position, yes, I do know she applied for that.

4 Q. Was she qualified?

5 A. She was qualified to be interviewed.

6 Q. Okay. If you're qualified to be  
7 interviewed, does that mean you're qualified for the  
8 job?

9 A. It generally means that you made -- had  
10 the basic level of qualifications.

11 Q. For the job?

12 A. For the job.

13 Q. Okay. Was it the same thing with the  
14 executive directors, if you went in for an interview  
15 for one of those executive director positions, you  
16 were qualified?

17 A. I would assume so, but I wasn't involved  
18 in that interview process.

19 Q. Is that what it typically means, you don't  
20 interview the people who aren't qualified?

21 A. No. There are many factors that would  
22 drive whether you decide who all to interview for a  
23 particular job, so it wouldn't -- generally, I would  
24 hope that we don't, as a practice, interview people  
25 who aren't qualified, but that's part of the

1 interview process, too, to determine those  
2 qualifications.

3 Q. Okay. Now, when you interview someone,  
4 when you were interviewing the people for the  
5 executive officer of equity, diversity and  
6 inclusion, how long were the interviews?

7 A. They were generally somewhere around 30  
8 minutes.

9 Q. And would you ask them background  
10 information, like why do they want the job?

11 A. Probably so. I'm trying to remember all  
12 the specific questions but...

13 Q. Do you ask them about their experience and  
14 jobs before they got there?

15 A. Yes.

16 Q. Do you ask them about anything that may  
17 affect their background like criminal records?

18 A. No, I wouldn't ask that.

19 Q. Okay. Do you want to know about criminal  
20 records?

21 A. I believe that comes up later in the  
22 process when we do a background check of the  
23 employee, so, yes, it is part of the process. I  
24 think that's right.

25 Q. Do the applicants have to fill out

1 information online?

2 A. For what?

3 Q. For the position?

4 A. To apply for the job?

5 Q. Yes.

6 A. Yes. They end up submitting an  
7 application for a job.

8 Q. And do you have access to that  
9 information?

10 A. Yes.

11 Q. Does that ask whether or not they've ever  
12 been convicted of a crime?

13 A. I'm not sure about that. I believe that  
14 the background check -- well, I know that the  
15 background check comes up later on in the process,  
16 because it requires employees to go through -- I'm  
17 not sure all of the question on the application. We  
18 use a standard application that is kind of the same  
19 for all types of employees for the district, so I'm  
20 not sure the full extent of that.

21 Q. Now, when you interviewed the people, how  
22 many did you actually interview?

23 A. Three.

24 Q. And who were those three?

25 A. Dr. Turner, Jane Doe and Mr. Hughes.

1 Q. Okay. Now we've asked for the interview  
2 notes and there's not any, are there?

3 A. I don't keep -- I don't take or keep them.

4 Q. Did you know that the EEOC requires  
5 documentation with regard to hiring and promotions  
6 kept?

7 MS. STEINER: Objection to the form.

8 THE WITNESS: Not a legal expert on that.  
9 I don't actually usually take notes in interviews.  
10 I'm really concentrating on listening to the  
11 employees, so I don't even know if they were kept --  
12 if they were created.

13 BY MS. STEINER:

14 Q. Now, for Ashford Hughes, why did he get --  
15 did you think Jane Doe was qualified for the job?

16 A. I thought that she was -- I wanted to  
17 interview her to find out more, and during her -- in  
18 her application and during her interview, she  
19 focused on one component of the job that was more  
20 limited and more related to just a small piece of  
21 the job. She did not express knowledge or expertise  
22 in the main part of the job, which is diversity,  
23 equity and inclusion.

24 Q. Did you know she had a background in  
25 diversity, equity and inclusion?

1           A.     You would have to tell me more about that.  
2     My understanding is that she had -- during her  
3     interview, what she expressed was much more about  
4     school options that were related to the other job  
5     that she held.

6           Q.     Okay. Now, did the job position request  
7     that the applicant have a master's degree?

8           A.     I would have to look at it. There may  
9     have been like a -- it would be nice if you had  
10    these additional qualifications. If you have it,  
11    I'll be glad to look at it.

12          Q.     Did you know whether or not Jane Doe has a  
13    master's?

14          A.     I believe I remember that.

15          Q.     Did you know whether or not Schunn Turner  
16    has a master's?

17          A.     I know she has a doctorate, I would assume  
18    she got a master's along the way.

19          Q.     Did you know Ashford Hughes does not have  
20    a master's?

21          A.     Yes.

22          Q.     Okay. When you interviewed Ashford  
23    Hughes, tell me what it was that he had engaged in  
24    the year before you interviewed him that made you  
25    think he was good for the job. I want to focus on

1 the year before.

2 A. The year before.

3 Q. Uh-huh.

4 A. So I'm trying to get my years lined up.

5 So he had been in the mayor's office running for the  
6 entire City of Nashville, their diversity, equity  
7 and inclusion work. I believe immediately prior to  
8 that, he was working for a U.S. presidential  
9 campaign and advising on diversity, equity and  
10 inclusion issues in the communities around  
11 Tennessee.

12 Q. What U.S. presidential campaign was he  
13 working on?

14 A. I believe it was Michael Bloomberg.

15 Q. Did he tell you that?

16 A. I -- well, I mean, obviously during the  
17 interview, yes, he did.

18 Q. Did you check his references on that?

19 A. No.

20 Q. Was he in the mayor's office before he  
21 came in for the interview with you?

22 A. Immediately prior, is that what you mean?

23 Q. Yes.

24 A. No. The mayoral administrations had  
25 changed.

1 Q. Do you know what he had done the year  
2 before he came in to interview with you?

3 A. I thought I just answered. Worked some  
4 for the Michael Bloomberg campaign.

5 Q. Okay. Any other job in the year before  
6 that?

7 A. I'm trying to remember. No, I don't  
8 remember specifically.

9 Q. Was he paid a salary by the Bloomberg  
10 campaign?

11 A. I didn't get into that with him.

12 Q. Okay. Did you know Ashford Hughes through  
13 the work with the democratic party?

14 A. Say that again.

15 Q. Did you know Ashford Hughes through his  
16 work through the democratic party?

17 A. I did not know him at the time for that.

18 Q. Did you or anyone at Metro schools or  
19 Metro government contact Ashford Hughes to tell him  
20 to apply for that position?

21 A. Yes.

22 Q. Who?

23 A. I did.

24 Q. Why did you contact him?

25 A. I seek to build the best possible pool of

1 candidates for which to interview, and certainly  
2 someone of Mr. Hughes's caliber to work with Metro  
3 government would be someone that I would like to be  
4 considered for interview pool, application pool.

5 Q. Did you have any discussions with Dr.  
6 Battle and Ashford Hughes?

7 A. Yes.

8 Q. Did she like Ashford Hughes, as well?

9 A. What do you mean by "like?"

10 Q. Did she think he should be in that  
11 position?

12 A. That would not be what we talked about.  
13 What we talked about was, you know, thinking about  
14 the role, the type of qualifications we'd want in  
15 the role, and then let her know that I was reaching  
16 out to him to be a part of the applicant pool.

17 Q. Did she tell you to reach out to him or  
18 did you decide to reach out to him?

19 A. I decided to reach out to him.

20 Q. Now, did anyone at all tell you that you  
21 could not hire Jane Doe in that position because she  
22 has a lawsuit against Metro?

23 A. No.

24 Q. Did you hear any rumors that other  
25 personnel at Metro schools were told that?



1 A. No.

2 Q. Okay. Now, I want to show you what's been  
3 produced. Hang on a second.

4 Okay. Can you see this document that's  
5 got at the very top of the page, Ashford R. Hughes?

6 MR. FOX: No. It's like your folder.

7 THE WITNESS: Technology is good until  
8 it's not.

9 MR. FOX: Yes.

10 BY MS. STEINER:

11 Q. Can you see this?

12 A. Yes, I can.

13 Q. Does this have candidate name, Ashford R.  
14 Hughes at the top of the page?

15 A. Yes.

16 Q. MG 000183?

17 A. Yes, ma'am.

18 Q. If you're hiring someone that works in the  
19 school system --

20 MR. FOX: Looks like for the record,  
21 you're scrolling down to 184.

22 MS. STEINER: Excuse me? What was that?

23 MR. FOX: Looks like you scrolled down to  
24 184, is what you were going to ask him about. 183  
25 was the page above.

1 BY MS. STEINER:

2 Q. Okay. If you are interviewing from  
3 someone to work in the school system, is it  
4 important to know whether or not they have a  
5 criminal record?

6 A. When I'm interviewing?

7 Q. Yes.

8 A. Not at this point.

9 Q. Do you care if the applicants have a  
10 criminal record?

11 A. At a specific point or in general?

12 Q. In general, do you care?

13 A. I care to the extent to which it would  
14 impact their ability to do their job.

15 Q. Okay. What happens if they have, I think  
16 two DUIs, does that enter the picture?

17 A. That sounds like a hypothetical situation.  
18 Are you referring to something?

19 Q. I'm asking a hypothetical. What do you do  
20 if someone is interviewing and they have two DUIs?

21 A. Depends on the situation.

22 Q. What happens if they have a possession  
23 charge, too?

24 A. Again, depends on the situation.

25 Q. What happens if they also have a

1 possession of weapons charge?

2 A. It depends on the situation.

3 Q. Did you know whether or not Ashford Hughes  
4 had any of these in his record?

5 A. What I was aware of when the background  
6 check was done, that there were some things that  
7 were brought to my attention, asked about whether  
8 they would be disqualifying for the position. The  
9 answer to that was no. And I asked about general  
10 timeframe, and it was some point younger in his  
11 youth. Obviously, we're in the business of -- we  
12 try to build staff that reflect our students and not  
13 everybody is perfect. We have a school board member  
14 who I think has some of those same issues that are  
15 on the school board, so it depends on the context of  
16 the situation.

17 Q. So -- and you knew Ashford Hughes did not  
18 have a master's, correct?

19 A. Yes.

20 Q. And let's go -- did you see his  
21 application that he filed online, by any chance,  
22 that we are looking at right now?

23 A. I think I would have been given the resumé  
24 from this. I'm not sure of the actual application.

25 Q. Do you see -- I want to ask you one

1 question first.

2 A. Okay.

3 Q. He doesn't have a master's, do you see  
4 where he's talking about his education?

5 A. Do I see that on the page?

6 Q. Yes.

7 A. Yes.

8 Q. See where it says Tennessee State  
9 University, he's got a political science -- that's  
10 not in -- that has nothing to do with diversity,  
11 correct?

12 A. You're talking about his undergraduate  
13 degree --

14 Q. Yes.

15 A. -- whether it has to do with diversity?

16 Q. Yes.

17 A. I'm not sure there was a position back  
18 then -- I mean, a degree back then from universities  
19 about that. Yes, I definitely believe that  
20 political science, our entire political system, our  
21 setting of laws, policies, has an extreme amount to  
22 do with how we think about how those policies apply  
23 to our students and diversity, equity and inclusion.

24 Q. Did you see his GPA is 2.5 out of 4?

25 A. I do see that.

1 Q. Do you think that's adequate for a high  
2 level position at Metro schools?

3 A. Yes.

4 Q. And equates --

5 A. Let me just clarify. He got the degree,  
6 so, yes.

7 Q. The 2.5 equates to, what would you say, a  
8 C plus?

9 A. Sounds like it.

10 Q. That's not the best grade, though, will  
11 you agree to that?

12 A. Is a C less an A? Yes, I agree to that.

13 Q. Is a C less a B minus?

14 A. Is a C less than a B minus, yes, that's  
15 correct.

16 Q. And a C is less than a lot of grades a  
17 student can make, correct?

18 A. A C is less than a B or an A, that's  
19 correct.

20 Q. Now, let's go back up here. Do you see  
21 this where it's asking him for his driver's license  
22 number, and it says, have you been convicted of any  
23 traffic or any moving violations, and he says yes?

24 A. I do see that.

25 Q. And they want to know what. And he says a

1 DUI and speeding with marijuana possession; do you  
2 see that?

3 A. I do see that.

4 Q. Did you question him at all about those?

5 A. No.

6 Q. Would you agree that a DUI in 2006 and  
7 2004 speeding with marijuana possession is not a  
8 traffic violation?

9 A. I'm not an attorney, I don't know what the  
10 answer to that is.

11 MR. FOX: Objection to the form.

12 BY MS. STEINER:

13 Q. This says, have you ever been convicted of  
14 a criminal offense other than a minor traffic  
15 violation, and he reveals a 1999 misdemeanor,  
16 possession of a weapon, registered weapon; do you  
17 see that?

18 A. I do see that.

19 Q. Did you question him at all about that?

20 A. No, I did not.

21 Q. Okay. So then you don't know whether or  
22 not the weapon was a machine gun or a handgun or  
23 what it was, correct?

24 A. That's correct.

25 Q. Okay. And did you see where it says, have

1 you been convicted of a felony or misdemeanor and  
2 you have to identify them. Would you agree that in  
3 that section, he did not identify the DUI or the  
4 marijuana possession?

5 A. I guess I'm confused. He did reveal -- I  
6 mean, it's obviously on the application --

7 Q. Sure.

8 A. -- so he shared that. And then what was  
9 your question after that?

10 Q. It's not in the right spot, is it? It's  
11 not in the spot where you put your misdemeanors and  
12 felonies.

13 A. Let me read that again. So a DUI, in that  
14 moving vehicle thing?

15 Q. Yes. No. It's not -- DUI is criminal.  
16 Do you want me to go on down?

17 A. Wait. Wait. This here, court case in  
18 which was heard includes speeding, driving without a  
19 license or improper registration. I can see how  
20 someone could get easily confused by this.

21 Q. Let's go down a second, okay? Have you  
22 been convicted of a felony or misdemeanor, do you  
23 think he could also be confused on that when it says  
24 to list them?

25 A. It says, have you been convicted of a

1 felony or misdemeanor and he answers, yes.

2 Q. And he reveals the weapon.

3 A. But he doesn't say -- he's already listed  
4 the other thing, so I don't understand how that -- I  
5 guess he is conveying that to us there.

6 Q. Did you know about this when you  
7 interviewed him?

8 A. No.

9 Q. Did you know about this when you hired  
10 him?

11 A. Yes.

12 Q. How did you find out about it?

13 A. Through the background check.

14 Q. Do you do the background checks on the  
15 candidates that you are thinking about hiring?

16 A. No, because it requires action from them,  
17 it requires them to spend money, and that's why we  
18 keep the job open to make sure we get people all the  
19 way through the process.

20 Q. Did you get back the results of the  
21 background check?

22 A. Yes.

23 Q. Did you see them?

24 A. No. I -- no.

25 Q. Who -- did anybody talk to you about the



1 background check and what was on it?

2 A. Yes.

3 Q. Who?

4 A. Ms. Spencer. Lisa Spencer.

5 Q. And what did Ms. Spencer tell you was on  
6 the background check?

7 A. This information that you're relating  
8 here.

9 Q. Did she tell you anything else?

10 A. No.

11 Q. If someone --

12 A. I mean, I'm sorry, let me -- not that I  
13 can recall specifically. It's been a while.

14 Q. Did Ms. Spencer talk to you about anything  
15 else other than the background?

16 A. I don't know what you're asking. We  
17 talked about the application, we talked about -- she  
18 gave me the -- gave me the candidates who applied.  
19 I mean, I talk to Ms. Spencer all the time, so I'm  
20 not sure what you're asking.

21 Q. Did she talk to you about where he had  
22 worked the year before?

23 A. No.

24 Q. Okay. Did you do any checking to make  
25 sure, or did Ms. Spencer do any checking to make

1 sure that what Ashford Hughes was telling you was  
2 accurate?

3 A. Have general knowledge of him, so that  
4 would be irrelevant.

5 Q. Did you do a check to see whether or not  
6 he had any lawsuits pending against him?

7 A. Not that I'm aware of.

8 Q. Did you know whether or not he had had  
9 some issues with loans from a company called Cash  
10 One that he had not paid back?

11 A. Ms. Steiner, no, and that wouldn't be  
12 something that would normally come up in the course  
13 of doing business about his personal finances.

14 Q. Would you want to know if your applicant  
15 is going to a place called Cash One to borrow funds?

16 A. No. That's none of my business.

17 Q. So if your applicant is going to a loan  
18 shark, would you want to know it?

19 A. If my candidate is going to a loan shark?

20 Q. Uh-huh.

21 A. What is that term?

22 Q. Loan shark.

23 A. I'm not trying to be difficult, I  
24 literally don't know what that means.

25 Q. Okay. It means somebody that loans you

1 money at a high interest rate because you're a poor  
2 --

3 A. Like a credit card company?

4 Q. Or a Cash One. Company called Cash One.

5 A. Oh, like Advance Financial?

6 Q. Yes.

7 A. Somebody's personal finances are none of  
8 my business.

9 Q. Okay. Let's have this marked Exhibit  
10 Number 6, the Ashford Hughes.

11 MR. FOX: No objection.

12 (WHEREUPON, the  
13 previously-mentioned document was  
14 marked as Exhibit Number 6.)

15 BY MS. STEINER:

16 Q. Okay. I'll see if I can share the screen  
17 with you. I may not be able to. Hang on one  
18 second. Can you see this criminal record, case  
19 search?

20 A. Yes.

21 Q. I just want to ask you, these may be the  
22 ones that he listed and they may not be. Did you  
23 know that Ashford Hughes, and it's got his name up  
24 there at the top of the page, correct?

25 A. Yes.

1 Q. Did you know that he pled guilty to the  
2 possession or casual exchange on May 4 -- May 25,  
3 2004?

4 A. Okay. Yes, I'm seeing that.

5 Q. Did you know that when you interviewed  
6 him?

7 A. When I interviewed him, no.

8 Q. And here is another one, May 25, 2004,  
9 charged with DUI, and it looks like he was convicted  
10 on reckless driving; did you know that?

11 A. Not at the time.

12 Q. May 25th, 2004, he was convicted of the  
13 implied -- violating the implied consent law; did  
14 you know that?

15 A. No.

16 Q. Do you know what that is?

17 A. No, I'm not sure.

18 Q. Sure. Did you know that on May 25th,  
19 2004, he was also charged with driving with his  
20 license suspended?

21 A. No.

22 Q. Okay.

23 A. Are those all from the same event?

24 Q. Did you know that on January 15th, 2008,  
25 he was charged again with DUI and convicted of DUI?

1           A.     I see that here. Not at the time of the  
2 interview.

3           Q.     Did you know that on January 13th, 1999,  
4 he was charged with unlawful possession of a weapon?

5           A.     Not at the time.

6           Q.     Okay. Do you think you should have known  
7 about this?

8           A.     Through the interview process? We try to  
9 be really blind to those types of things, and  
10 interview people based on their merits and  
11 experience and qualifications, and then once we have  
12 kind of a -- I don't know what the technical term  
13 is, but a preferred candidate, then we do a  
14 background check, he obviously provided in his  
15 application.

16          Q.     Did you know that Schunn Turner and Jane  
17 Doe had nothing like this in their records?

18          A.     No. We hadn't done -- they had had  
19 background checks, I presume, as part of their  
20 previous appointment with MNPS, but it wouldn't have  
21 come up at that time.

22          Q.     Okay. We're going to have that chart  
23 marked as Exhibit Number 7 to your deposition.

24                         (WHEREUPON, the  
25                         previously-mentioned document was

1 marked as Exhibit Number 7.)

2 MR. FOX: No objection.

3 BY MS. STEINER:

4 Q. Do you check -- hang on a second. Okay.  
5 Let me see if I can get this to share with you. Do  
6 you have access to LinkedIn?

7 A. Do I have access to LinkedIn?

8 Q. Yes.

9 A. Right now?

10 Q. For the past few years, do you have  
11 access?

12 A. Yes.

13 Q. Do you use LinkedIn to check on your  
14 candidates, what they're doing?

15 A. Not explicitly. But do I sometimes do  
16 LinkedIn searches, yes, I do.

17 Q. Did you do that for Ashford Hughes?

18 A. I don't remember specifically.

19 Q. Let me ask you this.

20 A. Okay.

21 Q. You have the ability to do that if you  
22 want to, though, correct?

23 A. Like do I have the technical ability  
24 myself to search on LinkedIn?

25 Q. Yes.

1 A. Yes.

2 Q. And if you had wanted to look up  
3 Mr. Hughes on LinkedIn, you could have, correct?

4 A. Yes.

5 Q. Are you friends with him on LinkedIn?

6 A. I don't have -- I don't know. I might be.  
7 I have a good many connection on LinkedIn.

8 Q. Let me show you his LinkedIn account.  
9 Does that look like Ashford Hughes?

10 A. It does.

11 Q. Let's go down just a little bit. Do you  
12 see his experience here he's got listed?

13 A. Yes, uh-huh.

14 Q. And he says he's worked at Metro schools  
15 from June 2020 through the present.

16 A. Okay.

17 Q. And before that, he says he works for a  
18 company called, Blueprint Solutions Group, LLC.

19 A. I see that.

20 Q. He worked there from October 2019 through  
21 June of 2020.

22 A. It doesn't say that.

23 Q. He says he worked there to the present.

24 A. Yeah.

25 Q. Says he's worked there for two years and

1 six months, correct?

2 A. That is what's on the page.

3 Q. Okay. And it says he was there from  
4 October 2019, I assume through at least June 2020  
5 when he came to work for Metro.

6 A. I don't know.

7 Q. Do you know whether or not the executive  
8 officer for diversity, equity and inclusion can have  
9 other employment while working for Metro schools?

10 A. I don't, but I don't think there is any  
11 issue with that.

12 Q. Do you know how many hours he is spending  
13 with Blueprint Solutions Group?

14 A. I don't know whether he is currently or  
15 not, so --

16 MR. FOX: Objection to the form.

17 BY MS. STEINER:

18 Q. Did you know he was working for this  
19 company called Blueprint Solutions Groups, LLC?

20 MR. FOX: Objection to the form.

21 THE WITNESS: I don't remember that. I  
22 don't remember.

23 BY MS. STEINER:

24 Q. Okay. You said you also had a resumé of  
25 his?



1 A. Uh-huh.

2 Q. And did that have listed on it his job?

3 A. I can't remember at this point.

4 Q. Do you know whether or not anybody from  
5 Metro schools looked to see whether or not Blueprint  
6 Solutions Group, LLC even exists?

7 A. I don't know, because what we were basing  
8 our -- what I was basing my judgment on was his work  
9 in the mayor's office, and so that -- the mayor's  
10 administration changed when Mayor Cooper beat Mayor  
11 Briley after Mayor Briley took over for Mayor Berry,  
12 and so as -- what happens during those transitions,  
13 public servants that are working for the mayoral  
14 administration generally end up losing their jobs.

15 Q. Now, do you know whether or not when you  
16 were hiring Ashford Hughes, did you know that he  
17 claimed to have worked at this company called  
18 Blueprint Solutions Group, LLC?

19 A. I'm not sure -- no, I don't remember  
20 knowing that.

21 Q. Would you be surprised to know that that  
22 company is not a limited liability company, LLC,  
23 doesn't exist under Tennessee Secretary of State's  
24 website?

25 A. I didn't look that up, so I don't know

1 whether it's true or not.

2 Q. Would you be surprised to know that it  
3 looks like it's a company that he claims he runs?

4 A. Wait, what? Say it again.

5 Q. Did you know that he claimed to run his  
6 own business before he came in to work for Metro  
7 schools?

8 A. I believe he mentioned that he did some  
9 consulting between public servants. As  
10 administrations change, you try to put together  
11 different work to be able to make money, so that  
12 doesn't surprise me.

13 Q. Do you know whether or not his different  
14 work even brought in any contracts?

15 A. That wouldn't be of relevance to me.

16 Q. So then if Ashford Hughes basically did  
17 very little work from October 2019 through June of  
18 2020, that would have no bearing on your decision?

19 A. I think the original plan that factors way  
20 outside Mr. Hughes control, he worked for Mayor  
21 Megan Berry, who had a scandal and left office  
22 unexpectedly. She would have still been in office  
23 at the time we were hiring for this position, and so  
24 I'm sure he fully expected to be in that role, then  
25 transition to Mayor Briley, and Mayor Briley ended

1 up losing to Mayor Cooper in that race, so I could  
2 understand that somebody may not be able to piece  
3 together work during that time.

4 Q. When he worked for the chief diversity,  
5 equity and inclusion officer for Metro government --

6 A. He didn't work for them, he was the chief  
7 diversity, equity and inclusion officer.

8 Q. When he was that, he was only in that  
9 position for a little bit less than two years,  
10 correct?

11 A. Because they changed the title of it, so  
12 if you notice there, he started with, according to  
13 this sheet, with Mayor Berry's administration, 2015,  
14 and early 2018, she, to her great credit, saw the  
15 need for creating that chief diversity, equity and  
16 inclusion officer, and then put him in that role,  
17 and then, like I just mentioned, there was a change  
18 on the mayoral administration, so it makes sense  
19 that that wouldn't continue past the changes in  
20 those administrations.

21 Q. Okay.

22 A. I'm not sure that position currently  
23 exists with Metro government.

24 Q. Okay. Senior adviser to the mayor on  
25 labor and workforce development. Are you familiar

1 with that office in the state labor workforce and  
2 development?

3 A. Yes.

4 Q. And that is more focused on, I believe  
5 workers' comp and unemployment.

6 A. You're referring to the state position?

7 Q. The state labor and workforce development.

8 A. I don't have a sense of knowledge about  
9 the state's department of labor and workforce  
10 development.

11 Q. Do you know what the mayor's office on  
12 labor and workforce development was focused on?

13 A. That was about being inclusive, creating  
14 diverse people working with the city, making sure  
15 that the very diverse community that is Nashville is  
16 included in decision-making and that we are trying  
17 to -- that the city was trying to include them in  
18 the advancements the city was making.

19 Q. Do you see in his LinkedIn account  
20 anything in here about working for Lamar Alexander  
21 or Bloomberg? It wasn't Lamar Alexander.  
22 Bloomberg.

23 A. Two different African-American gentlemen.  
24 Mr. Freeman working for Lamar Alexander. Mr. Hughes  
25 worked for Michael Bloomberg, and, no, I do not see

1 that in there.

2 Q. Okay.

3 MS. STEINER: Could we have this marked  
4 Exhibit Number 8.

5 (WHEREUPON, the  
6 previously-mentioned document was  
7 marked as Exhibit Number 8.)

8 THE WITNESS: In your application packet  
9 you pulled up, I know that a resumé is generally  
10 included in that. Was it included in the packet  
11 that you just used as an exhibit?

12 BY MS. STEINER:

13 Q. This is all I've got. Now, there's a  
14 resumé here and we're going to open that up in just  
15 a second. I don't know whether it came with that  
16 packet.

17 A. I believe that you attach it, to my  
18 understanding, if the system is correct. That was  
19 at the top of that.

20 Q. Can you see it?

21 A. I can.

22 Q. Is that it? It takes up the whole page,  
23 Ashford Hughes?

24 A. Yes.

25 Q. Okay. Have you seen this before?

1 A. It looks familiar.

2 Q. Do you think you saw this when he was  
3 applying there?

4 A. I would assume so, yes.

5 Q. Okay. And this is Bates stamped MG  
6 000476.

7 A. Yes.

8 Q. Through MG 000478.

9 MS. STEINER: We're going to mark that  
10 Exhibit Number 9.

11 (WHEREUPON, the  
12 previously-mentioned document was  
13 marked as Exhibit Number 9.)

14 MR. FOX: No objection.

15 BY MS. STEINER:

16 Q. Okay. Do you see, it says that he worked  
17 for the office of the mayor as chief diversity,  
18 equity and inclusion officer from 2015 to present?

19 A. I see.

20 Q. Technically that's not correct, though,  
21 correct?

22 A. That's correct.

23 Q. And you knew that when you saw this,  
24 correct?

25 A. Yeah. Yes. I would have known that it --

1 it's common knowledge that the mayoral  
2 administrations change and that his was tied to the  
3 mayoral administration.

4 Q. But, also -- yeah, because it's not  
5 through the present, and on top of that, he wasn't  
6 chief diversity, equity and inclusion officer the  
7 whole time, correct?

8 A. Are you basing that off of the LinkedIn  
9 profile --

10 Q. Yes?

11 A. -- or his employment records with the  
12 city?

13 Q. His LinkedIn profile.

14 A. I agree that according to what you just  
15 showed me about the LinkedIn profile and now his  
16 resumé, that -- that those are broken out into two  
17 separate positions on LinkedIn and one position here  
18 on his resumé. I've not -- so, yes, I do agree.

19 Q. Okay. And --

20 A. You see there, too, here is where he puts  
21 the senior adviser for diversity, workplace and  
22 inclusion. Those were overlapping timeframes, and  
23 so I do see where he is breaking that out on the  
24 resumé.

25 Q. And he worked as the political director

1 for the Tennessee democratic party, correct?

2 A. According to what's on his resumé, that's  
3 correct.

4 Q. And he lists Megan Berry as his reference,  
5 correct?

6 A. What you're showing me right there, that's  
7 just giving his experience.

8 Q. Okay. Did you see this when --

9 A. One second. Would you go back to the  
10 bottom of the resumé?

11 Q. Yeah.

12 A. So one thing that he has here that has a  
13 concentration of African-American studies and public  
14 policy, so that gets further to his educational  
15 background. You were asking about that earlier  
16 around political science, and it looks like here he  
17 has also a concentration of that in African-American  
18 studies.

19 Q. And he left out his political science,  
20 didn't he?

21 A. He has public policy. Those are often  
22 synonymous.

23 Q. Those are what?

24 A. Those are often synonymous.

25 Q. Okay.



1           A.     Just depends on the term of art that the  
2 school uses.

3           Q.     He is African-American, correct?

4           A.     I would -- yes, he is. Let's have his  
5 resume marked the next-numbered exhibit.

6                   MR. FOX: No objection.

7 BY MS. STEINER:

8           Q.     And African-American studies, that could  
9 be the history, not necessarily dealing with  
10 diversity, correct?

11          A.     The history is inextricably linked to  
12 diversity. I mean, those things, you cannot untwine  
13 those. We have 400 or a millennia of oppression of  
14 people and 400 years in this country, so I would  
15 expect the history would be intertwined.

16          Q.     Do you know whether or not the  
17 African-American studies, what years it even dealt  
18 with?

19          A.     I'm not a curriculum expert on Tennessee  
20 State University, no.

21          Q.     Okay. Did you have any discussions with  
22 Ashford Hughes about what the concentration was  
23 about?

24          A.     No. By that point, he had gained so much  
25 experience that that wasn't my focus.

1 Q. Did you -- when you contacted Ashford  
2 Hughes to come in and apply for the job, what did  
3 you tell him?

4 A. I told him that this was a position that  
5 the previous administration had -- had repurposed or  
6 got rid of, not sure exactly what they did, that we  
7 were contemplating whether we'd be able to bring the  
8 position back, and that if we did, you know -- I  
9 can't remember if I asked him like what advice he  
10 would have for like creating the job, but I told him  
11 I would let him know once posted and asked if he'd  
12 want to apply.

13 Q. Did you contact Jane Doe and ask her if  
14 she wanted to apply?

15 A. I might have. I don't remember  
16 specifically. I think we were trying to make -- HR  
17 was trying to make sure they were aware of all of  
18 the vacant positions. I don't remember if I did,  
19 and I don't know if anyone else --

20 Q. Did you contact Schunn Turner?

21 A. She reached out to me right away asking  
22 about it, and I invited her to apply like I did for  
23 Mr. Hughes.

24 Q. Okay. If you do the criminal record  
25 check, does that mean that you're thinking about

1 hiring the person?

2 A. It does. It kind of progresses to the  
3 next stage, but depending on the answers, may not  
4 move forward.

5 Q. Did you do the record check -- are you the  
6 one that asks for the checks?

7 A. Yes. So I let Ms. Spencer know -- I  
8 believe this is how it works, that he was maybe the  
9 preferred candidate, is how we would say that, and  
10 then she went through the process that includes the  
11 candidate, of getting the background checks done,  
12 and then she communicates with our vendor who does  
13 it, works with TPI, et cetera.

14 Q. So you don't do the criminal records check  
15 until you know they're the preferred candidate, and  
16 that's to save money, correct?

17 A. Well, it's not our money. It would be --  
18 it would be superfluous to do that before you got to  
19 that stage, or else, at what point do you do it?  
20 Anybody who applies for the position, and it just  
21 gets messy.

22 MR. FOX: Objection to the form.

23 BY MS. STEINER:

24 Q. So you knew by the time that the record  
25 check was ordered that he was the preferred

1 candidate?

2 A. Yeah, that's correct.

3 Q. Now, do you know -- did you make any  
4 comments to Chris Henson when you were talking to  
5 him about the elimination of the central office  
6 positions, did you tell him, as well, in that  
7 conversation that you were adding in an executive  
8 officer of equity, inclusion and diversity?

9 A. Yes.

10 Q. And did you tell him that Ashford Hughes  
11 was going to get the job?

12 A. No. I don't remember making that comment.  
13 Might have been something related to -- you know,  
14 obviously, he knew Mr. Hughes from his extensive  
15 work with Metro city government, might have  
16 mentioned that I was inviting him to apply, but I  
17 don't remember specifically.

18 Q. Did you tell Chris Henson that you were  
19 inviting anyone else to apply? Is that a no?

20 A. Thank you. No.

21 Q. You've done very well.

22 A. Do you all typically break for lunch just  
23 so I'm mentally prepared?

24 Q. Yes. Hang on a second. I'm two steps  
25 away from -- okay. Here we go. Let's see if I can

1 do this. Okay. Do you see this? It looks like  
2 it's Ashford Hughes' application again.

3 A. Ashford, yes, I see that.

4 Q. And it is Bates stamped at the bottom of  
5 the page. It starts MG 000183.

6 A. Yes, I see that.

7 Q. Let's go down to external services; do you  
8 see this?

9 A. I do.

10 Q. It looks like -- that's the screening that  
11 you're talking about?

12 A. The background check?

13 Q. Yes.

14 A. Yes.

15 Q. And this page is Bates stamped MG 000197.

16 A. Okay.

17 Q. Do you see where the requested background  
18 check was requested on May 28th, 2020?

19 A. I do see that.

20 Q. So then sometime on May 28th, 2020, he  
21 would have been the candidate that you wanted for  
22 the job?

23 A. It sounds like that's the case.

24 Q. Okay. Now, and did you tell Lisa Spencer  
25 to do a background check on Jane Doe?

1 A. No.

2 Q. Did -- but you told me that you did a  
3 background check on Jane Doe -- you interviewed  
4 them?

5 A. I interviewed them, yes.

6 Q. Did you do a background check on anyone  
7 else?

8 A. For this job, no.

9 Q. Okay. Do you know why -- and would it  
10 have been Lisa Spencer who would have done the  
11 background checks?

12 A. She would have ordered or someone from her  
13 office would have ordered the background checks.

14 Q. Do you know why she would have ordered  
15 background checks on Priscilla Denise Puente,  
16 P-U-E-N-T-E?

17 A. I'm not sure who that person is.

18 Q. Do you know why she would have ordered a  
19 background check on Jonathan Marc, M-A-R-C Bolding?

20 A. I'm not sure who that person is.

21 Q. Okay. But you didn't tell her to do that?

22 A. No.

23 Q. You only told her to do one background  
24 check and that was on Ashford Hughes?

25 A. That's correct. We can do one background

1 check on the person if we think, if we move in a  
2 different direction, then we might order another  
3 background check.

4 Q. Okay.

5 A. I also don't know if an additional check  
6 would have been necessary if Ms. Jane Doe or Dr.  
7 Turner were selected since they, at that point,  
8 would have been continuous appointment to MNPS.

9 Q. Okay. Now, do you recall calling Jane Doe  
10 for the interview for the job that you hired her  
11 for -- that you didn't hire her for. Excuse me.  
12 Strike that. Do you recall contacting Jane Doe to  
13 come in for the interview?

14 A. Yes.

15 Q. And you wanted to interview that day,  
16 didn't you?

17 A. You know, it's difficult to recall back  
18 then. Possibly.

19 Q. Okay. And did you wait to decide who was  
20 going to be the front runner until you interviewed  
21 all three, Schunn Turner, Ashford Hughes and Jane  
22 Doe?

23 A. Jane Doe?

24 Q. Jane Doe. Thank you.

25 A. Yes. I wait to see what information is

1 gathered during the interview process.

2 Q. Now, did you know that Ms. Doe recorded  
3 you when you called her for the same-day interview?

4 A. No, I was not aware of that.

5 Q. And did you know that it looks like -- let  
6 me back up a second. (Playing audio recording)

7 Q. Is that your voice?

8 A. Yes.

9 Q. Is that your conversation with Jane Doe?

10 A. Yes.

11 Q. And the recorder has a date on this and  
12 it's May 29th, 2020; does that sound about right?

13 A. I would have to go back and look at my  
14 calendar. I believe you.

15 Q. Okay. And assuming that it's May 29th,  
16 2020, you had already ordered the criminal record  
17 check on Ashford Hughes the day before, correct?

18 A. I would have to -- I saw the document that  
19 you put in front of me. I would have to go back and  
20 check on that.

21 Q. Okay. And so did anyone tell you have to  
22 interview Jane Doe because otherwise it will look  
23 like you're retaliating against her for her Title VI  
24 complaint?

25 A. No.



1 Q. Did Dr. Battle or anyone else at Metro  
2 schools tell you that you needed to interview Jane  
3 Doe?

4 A. No.

5 Q. Did anyone -- when did you interview  
6 Schunn Turner, by the way?

7 A. Also on the same day. I conducted all  
8 three interviews the same day.

9 Q. So you ordered the criminal background  
10 check on Ashford Hughes before you even interviewed  
11 him.

12 A. I would have to go back and review.

13 Q. If those are the dates, May 28th, order of  
14 the background check, and May 29th, the interview,  
15 you ordered -- if those are correct, then you  
16 ordered his criminal background check before you did  
17 his interview?

18 A. So I don't order the background checks.  
19 That's done by human resources.

20 Q. You request it.

21 A. I don't know when I requested. I would  
22 assume it would be done after the interview. I see  
23 the date that you put before me.

24 Q. Mr. Clay, isn't it true from the word go,  
25 Hank -- isn't it true, Mr. Clay, that from the word

1 go, Ashford Hughes was the person who was going to  
2 get that job?

3 A. No. I don't know why you would say that.

4 Q. Okay. Did Dr. Battle tell you that you  
5 needed to hire Ashford Hughes and you did not need  
6 to hire Jane Doe?

7 A. No.

8 Q. Did she tell you you did not need to hire  
9 Schunn Turner?

10 A. No.

11 Q. Okay.

12 MS. STEINER: Good time to break if you  
13 want to for just a second. About 40 minutes; is  
14 that okay?

15 MR. FOX: Okay.

16 (Lunch break observed.)

17 BY MS. STEINER:

18 Q. Okay. Do you recall in the budget meeting  
19 when Jane Doe presented the budget, do you recall  
20 whether or not -- were you like her supervisor over  
21 her diversity office, school choice?

22 A. No, but that question is a couple of  
23 sentences. One, no, I was not her supervisor. She  
24 reported through student services. They had a  
25 different supervisor. Two, her office was not the

1 diversity office, it was just the school choice  
2 office.

3 Q. I messed that up. Thank you. Do you  
4 recall when she presented her budget, and I think --  
5 do you know who Kevin Knapp is?

6 A. Yes.

7 Q. Would she have presented her budget to  
8 Kevin Knapp?

9 A. I would assume it would be Kevin and  
10 Barry, but maybe just one of the two of them.

11 Q. Okay. Would Kevin Knapp have put changes  
12 in the system, the computer system?

13 A. Would -- is your question, would he have  
14 been the one to put changes in the computer system?

15 Q. Yes.

16 A. I'm not sure how it was set up then.  
17 Sometimes budget owners would do that, and then  
18 there is also the documents, though, sometimes  
19 mistakes happen between transmitting different  
20 documents.

21 Q. Okay. If Jane Doe were to testify that  
22 she gave her budget to Kevin Knapp and she watched  
23 him literally put it in the system, the computer  
24 system, would you have any reason to differ from  
25 that?

1 A. No.

2 Q. Did you personally tell anybody to  
3 increase the Firefly contract back up to the 185?

4 A. No.

5 Q. Do you know who did that?

6 A. No.

7 Q. Can you give me any reason why that would  
8 have occurred?

9 A. I don't know why it occurred, but if I had  
10 to guess, it was just a mistake.

11 Q. Do you know when the mistake was caught,  
12 by any chance?

13 A. No.

14 Q. Okay.

15 A. If it was a mistake. Again, I wasn't in  
16 those conversations.

17 Q. Did you know --

18 A. Speaking of, would you go back and remind  
19 me, what was the date that you give me for that  
20 recording you played earlier?

21 Q. May 29th.

22 A. That -- I was trying to remember. That  
23 seems late. Would you look again? I didn't see  
24 what you had given me for that.

25 Q. It says May 29th, 2020 at 8:10 a.m.

1           A.     I -- you know, the only thing I reviewed  
2 going back for this was my calendar, and I remember  
3 the interviews that we conducted were earlier, like  
4 May 19, so I don't know why -- if that was a  
5 recording set up -- do you think she could have  
6 recorded me on her computer and then played -- then  
7 she made that secondary recording at that point?  
8 Regardless, the interviews were on May 19th.

9           Q.     The interviews were May 19th?

10          A.     Yes.

11          Q.     How do you know that now?

12          A.     Because I went back and looked at my  
13 calendar to make sure my memory was not off.

14          Q.     And do you have the calendar with you?

15          A.     Just on my phone, yeah.

16          Q.     Can you pull that up?

17          A.     Sure. Let me turn it back on.

18                   What do you need to see?

19          Q.     Let me see your calendar.

20          A.     You can scroll up. You'll see the other  
21 interviews during the day.

22          Q.     Did you really actually interview Ashford  
23 Hughes?

24          A.     Yeah.

25          Q.     Can we have a copy of this, of your

1 calendar?

2 MR. FOX: Maybe a screen shot or  
3 something.

4 THE WITNESS: Do I send that to Brook?

5 MR. FOX: Yeah, send it to me and I'll  
6 forward.

7 MS. STEINER: Can we break just a minute?

8 MR. FOX: Yes.

9 (Brief break observed.)

10 BY MS. STEINER:

11 Q. Did Jane Doe interview on a day different  
12 than everyone else?

13 A. No, it was all on the same day.

14 Q. If she said that you called her on one day  
15 to interview and she said she couldn't make it, it  
16 needed to be another day, did you check your  
17 calendar to see if there could be some other day for  
18 Jane Doe?

19 A. I mean, in the audio you played for me,  
20 she said no that didn't happen.

21 Q. Okay. Okay. Okay.

22 A. Obviously, you heard that she was debating  
23 about whether she could do it that day and then  
24 decided to. It may be in -- you know, you were  
25 pulling up like the record of when all the contacts

1 were made -- well, that was probably just specific  
2 to Mr. Hughes. But you may be able to see that, at  
3 least when I interviewed him.

4 Q. Okay. Okay.

5 A. And she mentions her son's fourth grade  
6 graduation. That also gave me the clue, it's like,  
7 that happens earlier in May, so we were out of  
8 school by May 29th.

9 Q. Okay. Now, when the two executive  
10 director jobs were added, do you know whether or not  
11 those jobs would have been at the cost of about  
12 135,000 apiece?

13 A. That sounds reasonable, maybe without  
14 benefits.

15 Q. With benefits, would have been how much?

16 A. We usually estimate about 30 percent,  
17 additional. Depends on what the actual is, of  
18 course.

19 Q. Would that be about 40,000 extra?

20 A. Sounds about right.

21 Q. So that would be about 175 apiece?

22 A. Uh-huh.

23 Q. So for a total saving of cost of 350; is  
24 that about right?

25 A. Sounds about right.

1 Q. 350,000?

2 A. I would have to refer to Mr. Henson for  
3 the specific -- or to HR for the specific.

4 Q. So then if you're saving about a million  
5 in the central reorg docs, you're actually paying  
6 out an additional 350.

7 MR. FOX: Objection to the form.

8 BY MS. STEINER:

9 Q. Correct?

10 A. This -- the document you were looking at  
11 shows reductions, and that doesn't take into account  
12 like the net amount, if that makes sense.

13 Q. Okay. Was Chris Henson, Barry Booker,  
14 would you consider them to be the experts, go-to  
15 people at Metro about the budget?

16 A. Yes.

17 Q. Who is doing the school choice job duties?

18 A. The team, so the people who were actually  
19 processing it are still -- you know, that's still  
20 the process. That responsibility for leadership and  
21 oversight ended up being a part of the executive  
22 office of diversity, equity and inclusion position.  
23 That's a component of it.

24 Q. Did you know that Jane Doe was promoted, I  
25 guess, or taxed by Karl Dean to be on the diversity



1 task force for MNPS?

2 A. So that's going back a ways. What I do  
3 remember is that MNPS put together, probably in  
4 relation, but Mayor Dean, a committee to look at  
5 diversity issues and included a lot of people. I  
6 would expect she probably was on there.

7 Q. Do you know that Jessie Register put her  
8 on the diversity task force, as well?

9 A. Yeah, yeah. Yes.

10 Q. Did you know that she was responsible for  
11 writing all the diversity policies that were changed  
12 because of anything that came out of the department  
13 of civil rights?

14 A. I would not characterize that as all the  
15 diversity policies. She was, from my understanding,  
16 involved with writing school choice type policies,  
17 and I'm not sure if she, because we have different  
18 title issues that was dealt with, there were several  
19 things beyond that scope. Unfortunately, the things  
20 that you're bringing up, too, are things I don't  
21 believe she brought up in her interview, but I know  
22 Jane Doe and I know -- I have great feelings about  
23 her.

24 Q. Did you ask her in her interview, do you  
25 have any experience in diversity that's not school

1 choice?

2 A. I was -- they're mainly open-ended  
3 questions. I'm trying to remember the precise  
4 questions that we asked, but she would have had  
5 plenty of opportunity to bring those things up, and  
6 plus I'm generally familiar with her work as being a  
7 colleague of hers for many years.

8 Q. Would you agree she puts forth very good  
9 work?

10 A. I would say that I never had any reason to  
11 doubt her work and enjoyed being a colleague with  
12 her.

13 Q. Did you think she was honest?

14 A. I have no reason to have ever doubted her  
15 honesty.

16 Q. Did she seem competent as the director of  
17 school choice?

18 A. I did not have direct oversight of her  
19 work, but I never had any reason to doubt her  
20 competence.

21 Q. Now, I want to ask you just about  
22 nonrenewing a contract. Have you ever non-renewed  
23 somebody that's in your division?

24 A. So first of all, that's not -- that's not  
25 the phrase for the employees, we're at-will

1 employees.

2 Q. Uh-huh. Excuse me?

3 A. We are at-will employees. That's not --  
4 that's not the phrase that -- nonrenewing a  
5 contract, like what you're referring to, is more  
6 like a principal or maybe a superintendent. She, to  
7 my understanding, is a tenured teacher, but that  
8 wouldn't have been the phrase I would use.

9 Q. So in your department --

10 A. Uh-huh.

11 Q. -- you do not non-renew contracts?

12 A. In my department, I do not non-renew  
13 contracts. So the employees with whom I work, I  
14 don't believe anybody has a contract.

15 Q. Okay. Did you know -- are you familiar  
16 with nonrenewing a contract at Metro schools?

17 A. In terms of like principals?

18 Q. Yes.

19 A. Uh-huh. I'm generally aware of the  
20 concept. I'm not an expert on it.

21 Q. But you're chief of staff, so you do have  
22 some knowledge pertaining to that, correct?

23 A. Some knowledge, yes.

24 Q. Okay. Now, if you non-renew a contract,  
25 is that the same as a transfer or are those

1 different?

2 A. Is that the same as a transfer?

3 MR. FOX: Objection to the form.

4 THE WITNESS: Seems to me that those would  
5 be different, but that's getting into pretty precise  
6 technical definitions that I don't have full  
7 knowledge to answer on.

8 MS. STEINER: Do you know why Dr. Bailey  
9 lost his job as principal at White's Creek?

10 A. No.

11 Q. Okay. Do you have -- is there a cabinet  
12 at Metro schools?

13 A. Yes, we kind of use that term. It goes in  
14 and out with leadership team.

15 Q. In the spring of 2020, who was on the  
16 cabinet?

17 A. You would have each of the chiefs. At  
18 that point, we were, I think using the associate  
19 superintendents, community superintendents there, as  
20 well as some of the executive officers, I believe.

21 Q. Okay. But then when you were discussing  
22 the reorg, it wasn't then in front of the cabinet,  
23 it wasn't in front of the whole cabinet, it was just  
24 in front of you, Dr. Battle and who else?

25 A. It would be Mr. Henson, who was at that

1 time the chief operating officer, and the chief of  
2 human resources. That would be Dr. Barnes. I'm  
3 sure we, probably at various times, included Metro  
4 legal and probably at times Ms. Spencer for the  
5 operations of human resources. Lisa Spencer.

6 Q. You don't have any notes from the  
7 discussions about the reorg, correct?

8 A. No, ma'am.

9 Q. You don't have any notes from your  
10 interviews of the people who came in and interviewed  
11 for the executive officer of equity, inclusion and  
12 diversity?

13 A. That's correct. I did not keep any notes  
14 from that. I did not create any notes.

15 Q. Has anyone asked you whether or not any of  
16 these decisions were made in retaliation, outside  
17 counsel?

18 A. Outside of you, you mean?

19 Q. Uh-huh.

20 A. No.

21 Q. I want to go back and ask you about an  
22 exhibit. We're already made it an exhibit. Are we  
23 still hooked up? Let me share this with you real  
24 quick. Okay. Now I think we've already marked this  
25 as an exhibit. I'm just -- let me tell you the

1 number. This should be Exhibit 4. I just want to  
2 ask you a couple of questions about this. Who  
3 became the chief of academics in schools?

4 A. That's Dr. Mason Bellamy.

5 Q. Who became the executive director of  
6 school support?

7 A. That position became -- so can you scroll  
8 up a little bit? So the one you're referencing  
9 here, there were two executive director of school  
10 supports at the time, and we're re-purposing one of  
11 those positions, so I believe that position under  
12 this chart went away. It's a little confusing  
13 looking at this.

14 Q. Okay. So executive director of school  
15 support went away?

16 A. There is still an executive director of  
17 schools. Wait. Wait. Wait. That is -- excuse me.  
18 I misspoke earlier. Those were those two positions  
19 that we talked about extensively this morning of the  
20 executive directors of principal supervision,  
21 there's a couple like support. I believe that's  
22 what that is referencing.

23 Q. Okay. Chief of academics in schools is  
24 Mason Bellamy?

25 A. Correct.

1           Q.     Executive director of school support is  
2     referencing what?

3           A.     It would have been -- so if you recall the  
4     org chart and all the executive directors under the  
5     chief of academics in schools, remember we were  
6     talking about the one that became like the help to  
7     schools outside of the direct supervision, it would  
8     have been one of those roles.

9           Q.     Okay.   Executive office of diversity,  
10    equity and inclusion is Ashford Hughes?

11          A.     Mr. Hughes, yes.

12          Q.     And then executive director of federal  
13    programs to executive officer of state, local and  
14    philanthropic investments?

15          A.     Yes, ma'am.

16          Q.     Who is that?

17          A.     That's Dr. Carrie Randolph.

18          Q.     Is she serving in that position?

19          A.     Yes.

20          Q.     What's the approximate salary of that  
21    position; do you know?

22          A.     150,000.   I'm trying to remember if it  
23    was -- I think it was 150, I don't believe it was  
24    155, but it was either 150 or 155.

25          Q.     What does this mean, executive director of

1 federal programs to executive officer of state,  
2 local and -- does that mean the job got changed to  
3 that?

4 A. It did. It became a much more expanded  
5 role.

6 Q. And did the salary increase, too?

7 A. It did, commiserate with becoming  
8 executive officer rather than executive director,  
9 but much of that funding comes from the federal  
10 funding, not the operating budget. Some of it comes  
11 from the operating budget.

12 Q. Who is the executive director of charter  
13 schools, who was that?

14 A. Dennis Queen.

15 MR. FOX: For the record, what page number  
16 is this? What's the Bates number?

17 MS. STEINER: MG 001350.

18 BY MS. STEINER:

19 Q. Okay. Now, I'm not sure this is the exact  
20 same organizational chart, but I'm going to show it  
21 to you and we'll mark it as a separate exhibit. Do  
22 you see this one, it's Bates stamped at the  
23 bottom -- or it's dated March 2021?

24 A. Yes.

25 Q. Do you see on the far left-hand side where



1 it says executive directors, elementary 4, and then  
2 middle 2, high 2, and then school operations 4?

3 A. I do see that. Do you need to get the  
4 document number on here?

5 MR. FOX: Do you have a Bates number at  
6 the bottom?

7 MS. STEINER: It doesn't have one.

8 BY MS. STEINER:

9 Q. Is that what you were talking about,  
10 school operations for?

11 A. Yes, ma'am. It says operations here, but  
12 school support. It's a different way to say it.

13 Q. This school operations that's on this  
14 overall chart, organizational chart, is the  
15 operations that's referred to in Exhibit 4, I  
16 believe that we were discussing just a second ago,  
17 correct?

18 A. Yes, ma'am.

19 Q. Okay.

20 THE COURT REPORTER: Did you want to mark  
21 that as an exhibit?

22 MS. STEINER: Yes. Let's mark that.

23 (WHEREUPON, the  
24 previously-mentioned document was  
25 marked as Exhibit Number 10.)

1 BY MS. STEINER:

2 Q. Okay. Would you agree that Jane Doe was  
3 qualified for the job of executive officer of  
4 equity, inclusion -- diversity, equity and  
5 inclusion?

6 A. Yes. I would agree that she was qualified  
7 enough for me to interview her.

8 Q. Did you -- do you know who Chad High is?

9 A. I do.

10 Q. Did you contact him to tell him to come in  
11 for an interview for the executive director  
12 position?

13 A. Yes. I contacted him to help make sure  
14 that we had the qualified pool of applicants as that  
15 process was ongoing.

16 Q. Did anyone ask you to contact him?

17 A. Dr. Battle and I conferred about it.

18 Q. Who brought up the subject first, you or  
19 Dr. Battle?

20 A. I don't know. I don't know. He had  
21 expressed a passion for serving the hearts and minds  
22 of a broader school community. I can't remember  
23 precisely if it was Dr. Battle first or me first  
24 that had the idea.

25 Q. Do you know if the interviews were already

1 going on?

2 A. Yes. They were already going on.

3 Q. Did you contact anyone else outside Chad  
4 High?

5 A. No, I did not.

6 Q. And did you know Chad High was actually  
7 chosen for one of those positions?

8 A. Yes, I am aware of that.

9 Q. Did you ever see what his scores were for  
10 his interview?

11 A. No. I was not involved in that part of  
12 the interview process.

13 Q. Did you hear about the missing scores?

14 A. I have since heard about it from counsel,  
15 but I did not know about it at the time.

16 Q. Okay. Did Dr. Battle, at any point, tell  
17 you that some of the scores were missing?

18 A. No.

19 Q. Did she ever express any concern to you  
20 about being upset about scores being missing?

21 A. No.

22 Q. Has there been any investigation at Metro  
23 schools about why or how the scores ended up  
24 missing?

25 A. No, not that I'm aware of.

1 Q. Did you know that some of the interviewers  
2 of Chad High said that he was not doing well at all  
3 in the interview?

4 A. No, not aware of that.

5 Q. Do you know -- did you have discussion  
6 with Dr. Battle about the interviews for executive  
7 director being anonymous?

8 A. No, I did not.

9 Q. Do you know why they were anonymous?

10 A. I'm not an expert on that process. My  
11 suspicion is that they are anonymous so that they  
12 didn't get attributed to one person, people were  
13 able to share their thoughts.

14 Q. Did you know that Chris Barnes missed some  
15 of the interviews?

16 A. No. I don't think I was aware of that.

17 Q. Did you know he was hospitalized?

18 A. That he was hospitalized?

19 Q. Uh-huh. During the time period that the  
20 interviews were going on.

21 A. I'm trying to remember. I know that there  
22 were some health issues. I can't remember. I can't  
23 remember that.

24 Q. Why is Chris Barnes no longer at Metro  
25 schools?

1           A.     His wife had significant health issues.  
2     She -- they continued to -- his family continued to  
3     live in North Carolina while his son was a senior  
4     and then graduated from high school. He had  
5     planned -- he and his family had planned to move to  
6     Nashville following his son's senior graduation, and  
7     then his -- but then his wife's medical conditions  
8     continued to deteriorate, and so they couldn't do  
9     that. He ended up making the decision that he had  
10    to go home to be a good husband and father to his  
11    daughter and wife.

12           Q.     Okay. Do you know if, as the chief of  
13    human resources, he needed any sort of a license?

14           A.     I'm not aware of needing a license for  
15    that job.

16           Q.     And you do not have sort of an  
17    administrative license, correct?

18           A.     No, ma'am. I'm not on the administrative  
19    side.

20           Q.     And administrative side would be those who  
21    have input into the teachers, the teachers and  
22    schools, correct?

23           A.     Yes, ma'am.

24           Q.     And if you have a license, that's so you  
25    understand the workings of the school better,

1 correct?

2 A. You would have to ask the state why they  
3 decide to have a license. I'm not sure all the  
4 reasons, but that sounds right.

5 Q. What is your understanding about when a  
6 license is needed and why?

7 A. I don't know that.

8 Q. Okay.

9 A. I do know one of the times that you need  
10 it is when you are conducting a teacher evaluation,  
11 for obvious reasons.

12 Q. Did you interview Michelle Maultsby  
13 Springer --

14 A. No.

15 Q. -- for her job?

16 A. I'm trying to remember if I was on the  
17 panel or not. I don't think I was.

18 Q. Have you actually served on panels,  
19 interview panels?

20 A. What do you mean by that?

21 Q. You said you didn't know if you were on  
22 her panel or not. Have you in the past been on a  
23 panel?

24 A. Yes, ma'am. I was CEO of a statewide  
25 nonprofit and hired dozens of people, as well as

1 MNPS, yes.

2 Q. Have you been on any interview panels at  
3 MNPS?

4 A. Yes.

5 Q. When you're on those panels, have you been  
6 trained on what to do when you're on those panels?

7 A. No.

8 Q. Did you keep notes about any of your  
9 interviews when you were on those panels?

10 A. No.

11 Q. Have you ever kept notes of an interview  
12 while you've been at MNPS?

13 A. No, ma'am. I --

14 Q. Have you ever kept any notes --

15 MR. FOX: Objection. Let him finish his  
16 answer.

17 THE WITNESS: I have a fairly good memory.  
18 Usually we're talking about the subject right at the  
19 moment. I don't remember keeping notes on  
20 interviews -- making notes on interviews.

21 BY MS. STEINER:

22 Q. And you've been trained that that would be  
23 the proper course when you're interviewing someone?

24 A. I'm not -- no, I've not been trained. I'm  
25 not sure it is the proper course.

1 Q. Okay. And Ashford Hughes, was it his  
2 experience at the mayor's office that caused you to  
3 hire him over Jane Doe?

4 A. Yes.

5 Q. Anything else?

6 A. No. I mean, that was the most extensive  
7 exact -- you know, almost very, very similar  
8 analogous job that we were looking to create, so,  
9 no, that was by far the main attribute.

10 Q. Did you ask him at all about his  
11 experience with school choice?

12 A. I probably did. I would have to review --  
13 try to remember what questions I asked, but that  
14 was -- that is a minor, but important part of the  
15 job, and I don't believe that he had experience in  
16 school choice.

17 Q. Did you know that he was contacting Jane  
18 Doe to get her advice on how to do things after he  
19 took over?

20 A. Yes. I was vaguely aware. She also  
21 continued to be an employee of the school district,  
22 and so I also am aware that -- you know, she had  
23 been a long-time person in that job, and many people  
24 ended up e-mailing her after she left that job.

25 Q. Because they needed her advice, correct?



1           A.     They ended up e-mailing her because they  
2     didn't know that she had changed jobs yet. She  
3     would often correct them and then send them on to  
4     Mr. Hughes. You know, I never doubted that Jane Doe  
5     had a lot to offer the district, so not surprised of  
6     that fact.

7           Q.     Would you agree that she is much higher  
8     qualified than just a teaching job? Not to say  
9     anything is wrong about a teaching job, but --

10          A.     A teaching job is the highest possible job  
11     you could have in the district.

12          Q.     Sure.

13          A.     It is everything for us.

14          Q.     But it doesn't pay like director of school  
15     choice, correct?

16          A.     It depends on the teaching job. We now  
17     have teaching jobs -- maybe. I would have to review  
18     her salary. But we have PhD teachers that are  
19     making \$100,000 now, and so it would have to depend  
20     on the job. I kind of suspect that you're right,  
21     that she made more money. I'm not trying to change  
22     that, but it depends on the job and the  
23     circumstances.

24          Q.     Okay. Well, would you agree that Jane Doe  
25     is qualified for administrative jobs?

1 A. Yes.

2 Q. And she is definitely qualified for a  
3 teaching job, correct?

4 A. I don't hire teachers. I would think so.  
5 I believe she has a teaching license. She was a  
6 tenured teacher. I have no reason to suspect she  
7 wouldn't be qualified for that.

8 Q. Okay.

9 A. But I've also not supervised her and have  
10 not reviewed her performance.

11 Q. But you know she is qualified for  
12 administrative jobs at MNPS, correct?

13 A. Which, administrative can be used as a lay  
14 term and as a very specific term. Which case are  
15 you using it now? I don't know if she has an  
16 administrative license. Is that what you're asking?

17 Q. No. I'm not asking that.

18 A. Are you asking, is she qualified to work  
19 in some jobs at the support hub, what we used to  
20 call central office, yes.

21 Q. As an executive director or director?

22 A. It would depend on the job and the job  
23 qualifications, but I would expect that, yes, she  
24 would have the qualifications.

25 Q. Did you know that she applied for about 20

1 jobs?

2 A. No, I was not aware of that.

3 Q. Okay. Did you know that she was told she  
4 wasn't offered a job because she had sued the  
5 district?

6 A. No.

7 MR. FOX: Objection to the form.

8 THE WITNESS: No.

9 BY MS. STEINER:

10 Q. Okay. Did you have any input into the  
11 decision -- and I think I asked this, to have the  
12 executive directors reapply for their jobs?

13 A. That wouldn't have been my main call. Did  
14 I have any input? Probably, because there was so  
15 much movement happening in that area, that it seemed  
16 to be -- it would be my advice now, that that's the  
17 fairest way to do it.

18 Q. Why?

19 A. Because you had community superintendents,  
20 associate superintendents who were overseeing those  
21 people. You had several retirements. There were  
22 just a lot of moving pieces at the same time, and we  
23 owe it to our students to get it right and make the  
24 right selections to the best of our ability.

25 Q. You also owe it to your employees, too,

1 correct?

2 A. We care deeply about our employees, but  
3 what -- we are only doing this in service of our  
4 students.

5 Q. Can you tell me what was the service of  
6 the students in eliminating the director of school  
7 choice?

8 A. Well, unfortunately, it was budgetary and  
9 we didn't want to cut a school nurse, we didn't want  
10 to cut a social worker directly serving students, so  
11 we always try to cut at what used to be called  
12 central office before we cut any services directly  
13 going to schools. Everybody has a valuable  
14 position. We're in a lawsuit with the State right  
15 now over adequacy of funding. We are underfunded.

16 Q. Did you get the COVID money, the COVID  
17 funds; do you know?

18 A. Did we get --

19 Q. Funds from the federal government for  
20 COVID, 26 million?

21 A. Yes.

22 Q. Okay. And was that -- did that go  
23 directly to Metro schools?

24 A. No.

25 Q. Where did it go?

1 A. The State of Tennessee.

2 Q. So the 26 million that you got from the  
3 federal government for COVID, Metro schools turned  
4 around and gave it to the State of Tennessee?

5 A. No, ma'am, that's not what you asked.

6 Q. Okay.

7 A. You asked if Metro schools was directly  
8 given that money from the federal government.  
9 That's not how federal funds --

10 Q. You got it from the State of Tennessee?

11 A. Yes, ma'am.

12 Q. Okay. So the State of Tennessee gave you  
13 the 26 million in COVID funding?

14 A. Yes, ma'am. And to be clear, they did not  
15 just give us 26 million. There was a budgeted  
16 amount of \$26 million to which, if we had eligible  
17 expenses, we first had to submit a budget that was  
18 approved or not approved to the State. We then  
19 spent down funds based on that approved budget.  
20 When we spent down funds, we submitted documentation  
21 to get reimbursed from the State for those federal  
22 funds. So they did not deposit a check for  
23 \$26 million into our bank account, it was the  
24 process I just described.

25 Q. Okay. So Metro schools would have to

1 actually spend the money and then they apply to get  
2 refunded back from the State?

3 A. But first, prior to that, we had to have  
4 an approved budget spending plan.

5 Q. That's 26 million that was available that  
6 was over and above the approved amount in the  
7 budget, correct?

8 A. That is accurate.

9 Q. And that's for 2020, 2021 school year,  
10 correct?

11 A. The federal government approved those  
12 funds to be used from -- it came late in the summer.  
13 I would have to remember the precise date, but  
14 eligible expenses from the beginning of the pandemic  
15 through I think school year '23, maybe school year  
16 '22. I would have to remember. There was a lot of  
17 moving parts.

18 Q. So that's from the beginning of the spring  
19 of 2020.

20 A. Well, to remember --

21 Q. -- beginning of the pandemic?

22 A. Just to remind you, we did not know  
23 whether any of those funds would have existed at the  
24 beginning of the pandemic. They were approved by  
25 congress later on. The State took a while in

1     figuring out what their application would be like.  
2     They took a while to determine whether our  
3     application was approved, and so my guess is  
4     probably well into the fall before we actually got  
5     approved.

6           Q.     Would it have been reflected in the school  
7     board meeting's minutes when it was approved?

8           A.     Probably. The State had varying  
9     requirements of what they were required the school  
10    board to approve. I don't know if that would have  
11    been in the school board minutes.

12          Q.     If it's in the school board minutes, would  
13    it have been approved about that time?

14          A.     About what time?

15          Q.     Whatever time it's in the school board  
16    minutes.

17          A.     Maybe not. I mean, the minutes obviously  
18    take a little while to get out, so it just depends  
19    on when it was -- the timing of everything. I would  
20    have to go back and look at all that.

21          Q.     If the school board minutes have this  
22    approval of the federal funds in it, would it have  
23    been approved either sometime shortly before those  
24    minutes?

25          A.     Depends on what "shortly" is defined, but

1 around that time, yes.

2 Q. Okay. Now, can you see this that I'm  
3 showing you right now?

4 A. Yes, ma'am.

5 Q. It's a document that starts 0001492?

6 A. Yes.

7 Q. It is from Adrienne Battle to Mark North  
8 and to you. You're on there. And it's questions  
9 about the budget due by 4:00 p.m., see that?

10 A. Yes.

11 Q. It's dated May 5th, 2020.

12 A. Yes.

13 Q. I'm going to ask you just a couple of  
14 questions. Is this a document that would have been  
15 prepared by Mark North?

16 A. Probably in consultation with the broader  
17 team.

18 Q. Who's the broader team?

19 A. It would be Mr. Henson, me, Dr. Battle,  
20 depending on -- I'm trying to remember. Depending  
21 on who else the questions were targeted to.

22 Q. Okay. I'm going to ask you about one of  
23 these. Have you seen this document recently?

24 A. Not recently.

25 Q. But you do recognize this?



1 A. Seems familiar, yes.

2 Q. Does it appear to be accurate?

3 A. I would have to go through it and read it.

4 Q. Let's go through it then. Tell me when  
5 you're through. Start up here at 1.

6 A. You can keep on going down. There's no  
7 reason to think it's not accurate, if that helps  
8 you.

9 Q. Am I going too fast?

10 A. It looks -- I'm confident that's accurate.

11 Q. Do you know how many employees you have in  
12 central office?

13 A. No, because central office is a  
14 difficult -- for example, I believe our social  
15 workers might be counted as central office, but  
16 they're a hundred percent serving schools.

17 Q. How many do you think is in central  
18 office?

19 A. Somewhere around 300, but that's purely a  
20 guess.

21 Q. Okay. I want to ask you about this number  
22 4 regarding your department's departmental savings;  
23 do you see the a and b?

24 A. Yes, ma'am.

25 Q. Is that information correct?

1           A.     Let me read it. Is this -- I'm confused,  
2 because this is saying from fiscal year 2020, and if  
3 this was May 5th, 2020, we would have been talking  
4 about the budget for fiscal year 2021, so this is  
5 looking backwards, not at the fiscal year 2021  
6 budget. Are you in agreement with that? So I  
7 guess, what's your question here?

8           Q.     My question is this, do you see he says,  
9 as a result of the spending freeze and the fact that  
10 schools have been off campus due to COVID-19, that  
11 indicates it's spring of 2020, doesn't it.

12          A.     I agree with that.

13          Q.     MNPS will save approximately \$52 million  
14 by the end of fiscal year 2020; is that correct?

15          A.     Yes, that's familiar.

16          Q.     And that 52 million could have funded the  
17 1 million in jobs, why not?

18          A.     No, ma'am. First of all, that was -- when  
19 we present a budget, you have to think about  
20 recurring dollars. Those are talking about one-time  
21 savings in the extremely unusual situation of  
22 COVID-19 and the first part of that pandemic that  
23 resulted in those \$52 million of savings, and so  
24 that was a one-time thing. So, for example, you  
25 know, light bills, et cetera, just different when

1 school buildings are closed, custodial contracts,  
2 plus we were trying to save a hundred million  
3 dollars in one time based on what the city had  
4 requested.

5 Q. Okay. Now, the 52 million in savings,  
6 where did that go?

7 A. To -- you would have to ask Mr. Henson,  
8 but they either went to -- if -- okay. So  
9 everything is a projection when you set the budget  
10 in the fiscal year ahead. There are two sides to  
11 the equation. One are the budget expenses, which is  
12 what our budget is made up of, what you commonly  
13 think of it, and then the city, Metro general  
14 government, estimates the taxes to be brought in,  
15 and so it depends on -- you know, of course, we need  
16 a balanced budget. If we spend -- if the city takes  
17 in exactly as much revenue as forecasted and we  
18 spend exactly what we had budgeted, then would be no  
19 net change. If the city brought in exactly as much  
20 tax revenue as it projected and we reduced our  
21 actual expenses by 50 million, that would go into  
22 our debt fund. If we reduced our spending by  
23 52 million and the city's projections came in \$52  
24 million less than they had projected, then there  
25 would be no net change because the revenue wouldn't

1 be there to go into our fund balance. So it just  
2 depends on the situation.

3 Q. So it's possible that 52 million went in  
4 the fund balance?

5 A. It is possible that some number of that, I  
6 would have to --

7 Q. Now, despite the fact that's just a  
8 one-time occurring amount, would you agree that that  
9 one-time occurred amount may be able to fund the  
10 jobs for one year?

11 A. No, ma'am. Because that's not a fiscally  
12 responsible way to do budgeting, but I also have to  
13 point out that we don't get to decide where the  
14 funding comes from for our budget. Different  
15 mayoral administrations have had different  
16 philosophies of operating.

17 Q. Okay. Now, what is your budget today; do  
18 you know?

19 A. It's just over a billion dollars, like a  
20 billion 16, something like that, in the operating  
21 budget.

22 Q. So it's over 999 million?

23 A. Yes, ma'am.

24 Q. Okay. Back in 2020, the 2020, '21 budget  
25 was somewhere around 933 million, correct?

1 A. Yes, ma'am.

2 Q. So you've had quite an increase in the  
3 budget amounts from the spring of 2020 through the  
4 present date, correct?

5 A. So kind of. In terms of actual real  
6 dollars, yes, you're correct. Between fiscal year  
7 '21 and fiscal year -- excuse me. Fiscal year '20  
8 and '21, 914 and 933, something like that, that  
9 actually, because of the inflationary pressures the  
10 district faced, I think we had to make cuts during  
11 that point in our actual services to be able to  
12 maintain that funding amount. Then you are correct  
13 there is a very historic increase in the current  
14 fiscal year that we're operating. Almost all of  
15 that went to increasing teacher salaries and into  
16 the classroom.

17 Q. Would you agree that Pippa Meriwether was  
18 qualified as an associate superintendent?

19 A. I did not supervise her. I don't know.

20 Q. Would you agree, and I may have asked you  
21 this, that Lily Leffler qualifies as an executive  
22 director?

23 A. I didn't supervise her and I didn't review  
24 her performance.

25 Q. Okay. Now, I'm just going to ask you this

1 question. Do you think that Metro schools could  
2 have found a million dollars somewhere in the budget  
3 so it could have kept these jobs, if it had looked?

4 A. I think your question assumes that  
5 anything that we would have cut from would have been  
6 of lesser importance than where we did cut from. We  
7 made the best possible decisions we had with the  
8 information we had at the time.

9 Q. Did you have vacancies?

10 A. Yes.

11 Q. And do you know that the vacancies are  
12 often funded through the budget?

13 A. Say that again.

14 Q. The vacancies are funded through the  
15 budget, so even though you may not have somebody in  
16 a job position, you're receiving the money from  
17 Metro government?

18 A. Yes, I did know what, but you may not know  
19 that that also covers expenses where you might have  
20 gone over in other areas. So if you had -- for  
21 example, we get a lot of -- we're very fortunate to  
22 serve all the students who come to us. We had an  
23 influx of students from Honduras one year. Well,  
24 that would go into helping to offset those increased  
25 expenses in those areas.

1 Q. So is it true then that every year when  
2 you pass the budget, you know you're going to have  
3 vacancies that aren't going to be filled and you can  
4 use that money elsewhere?

5 A. What we do, we take a very conservative  
6 approach -- to get to the idea that you're looking  
7 at, if you pull back up, I'll be glad to walk  
8 through this with you, the budget that you had  
9 earlier.

10 Q. Which one?

11 A. Fiscal year '21.

12 Q. Okay. Can you see it?

13 A. Yes, ma'am. Scroll back up. All right.  
14 You see under employee compensation the bold  
15 headline?

16 Q. Yes.

17 A. And then you see right at the bottom where  
18 it says subtotal, vacancy turnover?

19 Q. Yes.

20 A. That's where we're estimating that idea  
21 that you just took of, of the \$3 million.

22 Q. Did you know that that estimate is very  
23 low compared to what it should be?

24 A. Well, that's making a lot of assumptions  
25 --

1 MR. FOX: Objection to the form.

2 THE WITNESS: We are budgeting for the  
3 future time. It is our desire to hire all the  
4 positions that we have. It may, at times, come in  
5 lower, it may come in higher. It would be, in my  
6 opinion, irresponsible to make that too much higher  
7 because you don't know that to be a fact. You're  
8 trying to hire all these positions. In a budget,  
9 you will have some -- and so if you scroll back down  
10 on this, this is the same one that we were showing,  
11 the \$1 million reduction, that 15,221,000 really  
12 should be 18,221,000 because we assumed that cut at  
13 the top, as well.

14 BY MS. STEINER:

15 Q. Okay. But that assumption is a pretty  
16 good assumption to make because you know you're  
17 going to have jobs that aren't going to be filled?

18 A. I don't know anything --

19 Q. Okay. Well --

20 A. -- about the vacancies.

21 Q. Okay. Let's talk about the unfilled  
22 position that we had in central office that got  
23 merged into Mason Bellamy's job.

24 A. Yes, ma'am.

25 Q. That job was unfilled for a whole year,



1 wasn't it?

2 A. Yes, but it wasn't necessarily planned to  
3 be that way.

4 Q. Was it funded in the budget?

5 A. Yes.

6 Q. And it would have been funded for way over  
7 100,000, correct?

8 A. It would be funded for the total cost of  
9 the salary and the benefits, which, yes, would be  
10 over 100,000.

11 Q. And that's just one job in central office  
12 that has 300?

13 A. Well, but you have to remember, your  
14 question was, do -- did we know at the beginning of  
15 that year that it was going to be vacant for that  
16 year. The answer to that is no, we didn't know what  
17 was going to happen. And if your question for that  
18 particular example, I believe we ended up filling  
19 that job in July, and so it would have been an  
20 incorrect assumption to think that it would have  
21 been unfilled for the whole next year.

22 Q. Okay. When you're doing these  
23 assumptions, okay, what is the margin of error for  
24 vacancies? What's the margin of error on that?

25 A. You would have to ask Mr. Henson or Mr.

1 Booker.

2 Q. Okay. So they would be the pros on that,  
3 not you, correct?

4 A. They would be the pros, but I have some  
5 experience in it, and so I try to rely on them. It  
6 would be awful -- there have been times under the  
7 previous administration, unfortunately I wasn't with  
8 the district at the time, that there was a time that  
9 the school district went over budget, had to go back  
10 to metro council and ask for an additional mid-year  
11 kind of emergency allocation of funds. We are very  
12 sensitive and being very conservative not to have to  
13 go back and do that. So any decision that we make  
14 is not just a one-off decision, you have to take it  
15 into totality of the entire district.

16 Q. I want to ask you this about property  
17 taxes. Property taxes in Metro Nashville got raised  
18 tremendously against the people who live here,  
19 correct, for 2020? 2021?

20 MR. FOX: Objection to the form.

21 BY MS. STEINER:

22 Q. Do you remember that?

23 A. I remember that property taxes went up.  
24 They were still much less than our peer districts  
25 around the city -- around the state, excuse me. And

1 I remember that then the property tax reappraisal  
2 occurred and I know my personal property taxes  
3 actually went down in comparison.

4 Q. Do you live in Davidson County?

5 A. I do.

6 Q. What is your home address? I'm entitled  
7 to know it.

8 A. Well, it's obviously public record. [REDACTED]  
9 [REDACTED] Nashville, Tennessee, 37212. Let  
10 me make sure I'm being very precise here, the  
11 property taxes, when it was reappraised, went down  
12 less than what the -- it was less than what it was  
13 when it was reappraised. So is your question, do I  
14 know that property taxes went up, yes, I do know.

15 Q. You said yours went down, though, when you  
16 were making this example, correct?

17 A. Yes. So it went up when it was -- when  
18 the property tax occurred, then the reappraisal  
19 happened and went down below where the property tax  
20 went up, if I'm remembering correctly. But higher  
21 than the original level from the beginning. So the  
22 reappraisal affected different houses in different  
23 communities differently.

24 Q. Did you --

25 A. The total amount -- I'm sure you know the

1 reappraisal --

2 Q. Did you --

3 A. -- cannot generate more tax revenue than  
4 what was -- than what was generated before the  
5 reappraisal.

6 Q. Did you contest your assessment?

7 A. I did not in this last round. I did --

8 Q. Let's see what you got here. Okay. Let's  
9 see. Hang on. Okay. Let's see what you were in  
10 2021. 2021, it looks like you were at 6,665,  
11 correct?

12 A. I would have to come around and look. I  
13 don't remember off the top of my head.

14 Q. Let's see where you were in 2020. Looks  
15 like you're right, you went down.

16 A. It happens differently in different --

17 Q. So you went down from 7,193.64 to 6,000.

18 A. I bet if you look before that, it was  
19 lower. It went up and then back down in between, so  
20 the year before that, it was lower than that. If  
21 you're in east Nashville -- anyway.

22 MR. FOX: Depends on --

23 BY MS. STEINER:

24 Q. You were only at 5,300 before that. Did  
25 you know some of the houses here got assessed

1 40 percent higher than they were?

2 MR. FOX: Objection to the form.

3 BY MS. STEINER:

4 Q. Did you know that?

5 A. I'm not an expert on the property tax  
6 history.

7 Q. Okay. Did you have any discussions with  
8 anyone about your taxes?

9 A. No, ma'am, I did not.

10 Q. Okay.

11 A. Are you aware of the tax law that says  
12 that when you do a property reappraisal, you cannot  
13 collect overall taxes that was there before the  
14 appraisal? So even though everybody's -- not  
15 everybody's. Even though the majority of the  
16 county's property values increased, there were some  
17 areas of the county that property values increased  
18 dramatically and other areas where it didn't  
19 increase quite as dramatically. So they have to net  
20 that out, and so the per amount -- that's what  
21 happened.

22 MR. FOX: So the amount collected is the  
23 same.

24 THE WITNESS: The amount collected has to  
25 be the same. I don't know how we got off on this

1 tangent.

2 BY MS. STEINER:

3 Q. Just a tangent.

4 A. Do I know that the property taxes  
5 increased in Nashville? Yes, I do. Do I know that  
6 that went to help to fund things like our school  
7 system? Yes, I do know that.

8 Q. And do you know that it went up  
9 tremendously for some of the citizens of Nashville?

10 MR. FOX: Objection to the form.

11 THE WITNESS: I know that I am thankful to  
12 have a mayor and Metro council who value public  
13 education, invest in education. I don't know  
14 everybody's individual -- I imagine that would be  
15 true for some people, that their taxes did go up  
16 tremendously.

17 BY MS. STEINER:

18 Q. Did Dr. Battle ever give you any idea or  
19 say any statements to you about Lily Leffler and her  
20 job performance?

21 A. No.

22 Q. Did she say anything to you about Pippa  
23 Meriwether and her job performance?

24 A. No.

25 Q. Did she say anything to you about Dr.

1 Cathey and his job performance?

2 A. No.

3 Q. Did she say anything to you about Jane Doe  
4 and her job performance?

5 A. No.

6 Q. Did she say the elimination of those  
7 positions were based, at any part, the associate  
8 director -- associate superintendent positions were  
9 based, in any part, on the job performance of Pippa  
10 Meriwether, Damon Cathey or Schunn Turner?

11 A. She never told me that, no.

12 Q. And you were in her office to discuss all  
13 aspects of that elimination of those positions,  
14 correct?

15 A. I'm not sure I could characterize as all  
16 aspects. There are probably aspects I don't know  
17 of. I'm not privy to all information. I was there  
18 to discuss thinking about how to respond to a budget  
19 crisis, the efficient operation of the organization,  
20 et cetera.

21 Q. And when you were responding to the budget  
22 crisis, you personally never asked anyone in the  
23 budget department about what they thought could be a  
24 good method to respond to the budget crisis?

25 A. No. I wouldn't say that. We had

1 extensive conversations about the \$18 million worth  
2 of savings that year that we were able to re-purpose  
3 to other goods, so, obviously, we had extensive  
4 conversations.

5 Q. Did you tell Chris Henson when you told  
6 him that you were going to reduce out the 1 million  
7 in jobs that Michelle Maultsby Springer was also  
8 being hired into the position that she ultimately  
9 got?

10 A. No. I would have no way of knowing that  
11 at the time.

12 MS. STEINER: That's it. I have no more.

13 MR. FOX: Okay.

14 (Brief break observed.)

15 EXAMINATION BY MS. HARBISON:

16 Q. Mr. Clay, my name is Jesse Harbison and I  
17 represent Dr. Cathey. I just have a couple of  
18 questions for you. Earlier you mentioned your  
19 LinkedIn account. Do you have your phone where you  
20 could pull that up and show us your LinkedIn  
21 account?

22 A. Yes.

23 Q. When you Google your name, it doesn't seem  
24 to come up.

25 A. Did for me. Would you like me to take a



1 screen shot?

2 Q. Can you just hand me your phone?

3 A. Sure.

4 Q. Oh, you're on there as Henry.

5 A. Yeah. Both of my names, but I think it  
6 says Hank in parentheses. I just Googled Hank Clay  
7 on LinkedIn and it came up.

8 Q. If your attorney asked you to get a screen  
9 shot of that, would you be able to do that and send  
10 it to him?

11 MR. FOX: If I did.

12 BY MS. HARBISON:

13 Q. Would you know how to do that?

14 A. Yes, I would.

15 MS. HARBISON: Could we get a screen shot  
16 of that?

17 MR. FOX: I will ask him.

18 BY MS. HARBISON:

19 Q. Thank you. Okay. Can you screen shot it  
20 now and send it to your attorney?

21 A. Are you looking for my experience part?

22 Q. Do the whole thing.

23 A. So the way that it's set up --

24 Q. But not the --

25 A. -- is that my experience is pretty

1 extensive, so it goes through several pages.

2 Q. That's fine.

3 A. Okay.

4 Q. If you could e-mail to Brook, and, Brook,  
5 could you e-mail it to me.

6 MS. HARBISON: And then we can make it an  
7 exhibit. Thank you, Brook.

8 (Off-the-record discussion held.)

9 BY MS. HARBISON:

10 Q. Back on the record. So your attorney just  
11 forwarded -- or Metro's attorney just forwarded  
12 those to me, so we'll make those the next-numbered  
13 exhibit, those screen shots of the LinkedIn profile.

14 (WHEREUPON, the  
15 previously-mentioned document was  
16 marked as Exhibit Number 11.)

17 MR. FOX: Collective Exhibit 11.

18 BY MS. HARBISON:

19 Q. How did you know Chad High before you  
20 reached out to him about the executive director job?

21 A. He was a principal.

22 Q. Okay. Do you interact with principals  
23 often?

24 A. Yes, but we have a lot of principals.  
25 But, yeah, I interact with him a pretty good bit.

1           Q.     Did you -- well, let me ask it this way.  
2     Why did you specifically know Chad as a principal as  
3     opposed to any of the other many principals that are  
4     employed by MNPS?

5           A.     I do know lots of other principals.

6           Q.     That wasn't my question.

7           A.     Say it again. Rephrase it.

8           Q.     Okay. Why -- when you say you knew Chad  
9     because he was a principal --

10          A.     Uh-huh.

11          Q.     -- why did he stick out to you as an  
12     executive director candidate as opposed to the many  
13     other principals at MNPS?

14          A.     I think we might have been looking for  
15     someone who -- so Steve Ball was retiring as  
16     executive director. He did not apply for the job.  
17     And Steve had been in an elementary executive  
18     director role, so I think we were looking for an  
19     elementary principal, and Chad had expressed  
20     background and an interest in helping beyond a  
21     school, and so he just came to mind. I wouldn't  
22     have expertise in how somebody would be selected  
23     over another person, but that's the answer to your  
24     question.

25          Q.     You said he had an interest in what

1 school?

2 A. In helping other schools beyond his  
3 school. He had a passion for -- we are trying to  
4 create a culture that cared deeply about employees,  
5 and he was -- he had independently talked about ways  
6 that he might be able to help support the -- put it  
7 in a better way, the social emotional support of our  
8 employees, in general.

9 Q. How do you know that?

10 A. He had reached out about it. I'm trying  
11 to remember who -- Dr. Norris, Elisa Norris, had --  
12 he had -- her job has evolved over the years, but  
13 she -- one of her jobs was to help advise  
14 principals, and she had developed, you know, a close  
15 relationship for those who sought that kind of  
16 support, and mentioned that -- that he had kind of  
17 like had this interest, and we didn't have a  
18 position for that, but then when we were thinking  
19 about the executive director, it's like, I wonder if  
20 this could be interesting, and then we ended up  
21 reaching out to him and he went through the process.

22 Q. So he had an interest in the social  
23 emotional aspect of the other employees at MNPS?

24 A. Yeah. So let me make sure I'm really  
25 clear. So I don't oversee the executive directors,

1 didn't oversee the process, wasn't involved with it  
2 except to the extent that I reached out to Mr. High  
3 to see if he wanted to apply for the position.  
4 Other people may have reached out to other people.  
5 I don't know. But that's the answer to your  
6 question.

7 Q. Okay. I want to make sure I understand  
8 this.

9 A. Yeah.

10 Q. At some point, Elisa Norris told you that  
11 Chad High was interested in the social emotional  
12 well-being of other employees; is that right?

13 A. Yes. That goes back way before all the  
14 stuff we're talking about, but, yes, that's correct.

15 Q. Okay. When did she tell you that?

16 A. I would be guessing, but probably  
17 somewhere in the fall of 2019, be my guess.

18 Q. What does that mean?

19 A. So are you familiar with social emotional  
20 learning?

21 Q. I am, but what does that mean as it  
22 relates to Chad High?

23 A. What does that mean as it relates to his  
24 interest, or what do you mean?

25 Q. Yeah. I just don't know. Does that mean

1 that he is a shoulder to cry on, does that mean that  
2 he's someone that people call when they are dealing  
3 with a problem? I mean, it's just kind of vague.  
4 What does "interest in social emotional learning"  
5 mean? I'm talking, can you explain to me what that  
6 means as it relates to Chad High?

7 A. So I think what you're trying to get to  
8 is, why did his name pop to my mind.

9 Q. Well, no, that's not what I'm trying to  
10 get to. I'll tell you what I'm trying to get to.

11 A. Please rephrase your question.

12 Q. So Chad High, when you say that he was  
13 interested in social emotional learning or social  
14 emotional well-being of other employees, can you --  
15 let me ask it this way. Can you give me a specific  
16 example?

17 A. It would be, we want our employees to feel  
18 motivated and they want to focus on the work that  
19 they have. Our employees have very complicated  
20 lives, very complicated work, and when he originally  
21 talked to me about the idea of like how can we  
22 better support so the employees, you know, have a  
23 place -- have an ability to deal with all the  
24 complexities of their lives that they're dealing  
25 with. It wasn't -- I think it's difficult to

1 explain because we don't have a position that does  
2 that. We didn't have a position that did it.  
3 It just -- it's a more vague concept about how can  
4 we support our employees.

5 Q. Because he had a vague concept about  
6 supporting his coworkers, that was what made you  
7 want to reach out to him; is that correct?

8 A. That was one of the things that made me  
9 wonder, I wonder if this person could be someone who  
10 can help lead their peers and support their peers.  
11 I believe that he went into -- I'm not sure which  
12 position he went into, but it just crossed my mind  
13 and I mentioned it. I don't remember if I was the  
14 first one to mention it or not, but I ended up being  
15 the one to reach out to him to see if he wanted to  
16 apply.

17 Q. Elisa Norris --

18 A. Uh-huh.

19 Q. -- did you talk to her about the fact you  
20 were going to reach out to him?

21 A. I'm trying to remember specifically. I  
22 don't know if I did at that point. I did reach out  
23 to her when she had let me know he was interested.  
24 I mean, lots of people try to talk to me all the  
25 time, and I did follow up with her to let her know

1     how our conversation went, and there wasn't a  
2     position like that at the moment.

3             Q.     She let you know that he was interested in  
4     the executive director position?

5             A.     No, ma'am, the vague one that you were  
6     referring to earlier.

7             Q.     Okay. Did you ever have a discussion with  
8     Elisa Norris as it relates to Chad High possibly  
9     being plugged into one of the executive director  
10    roles?

11            A.     I don't specifically remember that one way  
12    or the other. There's nothing that sticks out in my  
13    mind.

14            Q.     But it's possible that it happened, you  
15    just don't remember?

16            A.     It's possible.

17            Q.     Okay. Do you know whether Elisa Norris  
18    was on the interview panel for the executive  
19    directors?

20            A.     I don't know who were on those panels.

21            Q.     Okay. You said that you did discuss the  
22    executive director application process with Dr.  
23    Battle, correct?

24            A.     No. Maybe. Depends on which component  
25    you're talking about. I did discuss with her the



1     desire to expand the pool a little bit later on. I  
2     don't know the details of executive director  
3     process.

4           Q.     Tell me everything that you remember about  
5     that conversation.

6           A.     What I recall is that, you know, the  
7     interviews -- she was gathering the people as  
8     they're going through the interview process. We had  
9     a certain number of executive director positions  
10    that we needed to support our students. They had  
11    not yet found the right fit for those, and so while  
12    that process was still ongoing, we were discussing,  
13    well, I wonder if Chad might be an interested person  
14    to -- for him to apply and to interview through that  
15    process.

16          Q.     When you say they had not yet found the  
17    right fit, what do you mean by that?

18          A.     You would have to ask her, like her  
19    full -- like knowledge of that. I'm not sure who  
20    all applied, but what I mean from that is that we  
21    had a certain number of positions to fill to be able  
22    to support our schools, and they were still in the  
23    deliberative process and wanted to expand that, at  
24    least to Mr. High. I don't know if there was other  
25    people.

1 Q. Did Dr. Battle specifically mention Chad  
2 High as somebody that --

3 A. We both discussed -- I can't recall who  
4 had the idea first to reach out to him.

5 Q. Okay. It could have been either of you?

6 A. Uh-huh.

7 Q. Is that a yes?

8 A. Yes. Thank you.

9 Q. At this point, do you know whether the  
10 initial round of interviews had been conducted when  
11 you had this conversation with Dr. Battle?

12 A. No, I'm not precisely aware. It was --  
13 the contextual clues would lead me to something  
14 happened because they had some level of information.

15 Q. There had already been some interviews  
16 conducted?

17 A. Yes.

18 Q. Do you know anything about the scoring  
19 process for those interviews?

20 A. I'm sorry, I don't.

21 Q. Do you know that several people  
22 interviewed for the executive director job who  
23 weren't already executive directors but had been  
24 executive directors in the past?

25 A. No.

1           Q.    Don't you think that if somebody has  
2 served in a job in the past, actually been promoted  
3 above that job, that they're probably qualified to  
4 go back to the position of executive director?

5           A.    I don't know. It would have to depend on  
6 supervisory experience, and I just don't know the  
7 knowledge of that.

8           Q.    So when you say "supervisory experience",  
9 does that mean --

10          A.    Excuse me. I don't have experience  
11 supervising those people, so I wouldn't have insight  
12 into what their qualifications and what background  
13 were, and, you know, there's two separate standards.  
14 Whether you're qualified for a job is one standard,  
15 whether you rise to the top to be the person who  
16 should be selected I think is the standard we need  
17 for our students.

18          Q.    Okay. How do you determine whether that  
19 somebody meets that standard, whether you rise to  
20 the top, as you say?

21          A.    It would be a variety of inputs and  
22 information. I would assume -- I wasn't involved in  
23 the executive director search, but for positions  
24 that I am involved with, I would be looking at their  
25 resumé, their experience, knowledge of how they

1 performed, knowledge of what we're trying to achieve  
2 with the position, knowledge of what we hope that  
3 person to do, et cetera.

4 Q. If someone is seen as perhaps like a  
5 squeaky wheel with MNPS, someone who complains,  
6 could they maybe not rise to the top because they  
7 might not be the right cultural fit?

8 A. No, ma'am. Because we're a public  
9 organization and people have the right to express  
10 what they want. They do commonly. We have public  
11 comment at our school board meetings. Many of our  
12 employees comment there. That's not something that  
13 we take into consideration.

14 Q. Okay. Do you remember anything else about  
15 the conversation with Dr. Battle regarding the pool  
16 of candidates for the executive director position  
17 that you haven't already told me?

18 A. I'm trying to think back. No, that's  
19 everything that I can remember.

20 Q. Are you familiar with a contract that  
21 Metro had -- well, actually before we go there, you  
22 own another house, correct? Not just the one on  
23 [REDACTED] ?

24 A. Yes.

25 Q. Which one is your primary home?

1 A. [REDACTED]

2 Q. And the other one at [REDACTED]  
3 [REDACTED], is that the address?

4 A. For the other house?

5 Q. Uh-huh.

6 A. Yes.

7 Q. Is that a rental property?

8 A. Yes.

9 Q. Okay. And the property taxes there did go  
10 up, correct?

11 A. I would have to go back and look.

12 Q. Okay. Well, if I told you that on the  
13 trustee's website it says that in 2020, the tax levy  
14 was \$4,382.45, and in 2021, the tax levy was  
15 \$4,545.68, would you have any reason to deny that?

16 A. No, I mean, I'll be glad to look at it.

17 MR. FOX: Objection. I just think this is  
18 getting pretty far afield.

19 BY MS. HARBISON:

20 Q. Okay. So on the -- at the [REDACTED] house  
21 for the 2020 -- 2019 tax year, your property tax was  
22 \$5,376.90, correct?

23 A. Okay.

24 Q. And in 2020, in December of 2020, it was  
25 \$7,193.64, correct?

1 A. And then it went down, right?

2 Q. And that's about 34 percent, correct?

3 A. Am I reading that correctly that it went

4 --

5 Q. That's not my question. That's not my  
6 question. So between 2019 and 2020, it went up  
7 about 34 percent, correct?

8 A. Yeah, I don't disagree with that.

9 Q. Okay. Thank you.

10 A. And then it went down --

11 Q. Okay. That wasn't my question.

12 A. But that's what we were talking about  
13 earlier.

14 Q. Are you familiar with a contract that  
15 Metro had with Meharry regarding COVID-19 testing?

16 A. I am familiar. Well, sorry. I answered  
17 before you finished.

18 Q. Okay. This was a contract for about  
19 \$18 million for Meharry to provide COVID testing and  
20 related services, correct?

21 A. I would not characterize it that way.  
22 COVID testing was one of the things they were  
23 involved with, but it was a comprehensive COVID  
24 response package.

25 Q. One of those things was building a

1 website?

2 A. That was a minor part of it, but, yeah,  
3 that was one of them.

4 Q. It was minor, but they charged about \$1.75  
5 million to build that website; is that correct?

6 A. I would have to go back and look, but that  
7 sounds about correct.

8 Q. Do you remember the controversy about this  
9 issue?

10 A. Yes.

11 Q. Okay. Because the website was so  
12 expensive?

13 A. I remember the controversy was we have an  
14 extreme life-changing event of COVID 19, we were in  
15 the absolute peak at that point heading into  
16 November and December of 2019. We were trying to do  
17 everything possible to get our students back to  
18 school, building a comprehensive system to do so.  
19 We did it. We got schools back in-person education  
20 as soon as possible. We have kept them open since  
21 then, and the comprehensive strategy worked, and I  
22 am aware that some people have tried to take issue  
23 with that, yes.

24 Q. Do you think \$1.7 million is a reasonable  
25 amount to pay for a website that is a very simple

1 website?

2 A. I'm not a technology expert. The website,  
3 to my understanding, is a -- complete information on  
4 it, the background, it would be approved by -- the  
5 contract was approved by the school board and then  
6 went on to be approved by the State, and then went  
7 on to be -- the expenses to be reviewed by our  
8 programs team, and then went on to be approved for  
9 reimbursement by the State. So, yes, it did go  
10 though all of those.

11 Q. We're at the tail end of the day so let's  
12 focus on the question, answer the question that's  
13 asked, okay? So the contract was a no-bid contract;  
14 is that correct?

15 A. The contract was an emergency contract.

16 Q. It was a no-bid contract, correct?

17 A. The contract was an emergency contract  
18 that was a sole-source vendor.

19 Q. There were no bids for --

20 A. That's not the phrase that we use. We  
21 call it a sole-source vendor.

22 Q. Were there bids for the contract?

23 A. From other vendors?

24 Q. Uh-huh.

25 A. No, because it's a sole-source contract.



1 Q. With Meharry.

2 A. With Meharry.

3 Q. You did not get bids from anyone else for  
4 that contract?

5 A. Yes, that's correct.

6 Q. Now, the reason I'm asking you about this  
7 is, it seems that you're the person that discussed  
8 this in front of the school board; does that sound  
9 familiar?

10 A. That's accurate.

11 Q. Why were you chosen to discuss the Meharry  
12 contract at the school board meeting?

13 A. As chief of staff, this issue cut across  
14 multiple departments and I was helping to coordinate  
15 that response.

16 Q. And this was in 2020 when this contract  
17 was awarded, correct?

18 A. That's accurate.

19 Q. Okay. And it was for about \$18 million  
20 total, correct?

21 A. The contract award was for that, the  
22 actual expenses came in about 20 percent less than  
23 that.

24 Q. Okay. Are you aware that one of the  
25 subcontractors that worked on this contract posted a

1 picture of himself with a Ferrari on Instagram  
2 saying something about, chalk it up to the game?

3 A. I'm aware of that report. I didn't look  
4 at the Instagram post myself, but, yes, I'm aware of  
5 that report.

6 Q. Okay. So in 2020, Metro awarded an  
7 \$18 million contract to -- for profit entity  
8 affiliated with Meharry, correct?

9 A. That's correct.

10 Q. Including \$1.7 million for Meharry to  
11 build a website, correct?

12 A. That's correct.

13 Q. Okay. I don't have anything further.

14 REDIRECT EXAMINATION BY MS. STEINER:

15 Q. Where did you get the funds to pay for  
16 that contract?

17 A. Those were federal funds. Those were  
18 one-time expense -- for a one-time -- one-time  
19 funds.

20 MS. STEINER: Okay. Thank you.

21 FURTHER THIS DEPONENT SAITH NOT

22

23

24

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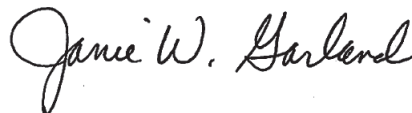
## REPORTER'S CERTIFICATION

STATE OF TENNESSEE       )  
COUNTY OF DAVIDSON       )

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I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.



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BY MS. HARBISON: [5] 201/12 201/18 202/9 202/18 213/19 BY MS. STEINER: [81] 5/16 15/15 17/5 21/10 24/14 26/10 26/24 27/15 32/14 37/11 38/24 40/20 41/15 42/12 44/2 44/15 47/13 47/25 48/9 48/15 49/1 49/17 50/9 50/21 51/13 52/14 52/20 52/25 53/11 62/8 66/17 68/24 69/7 69/14 71/15 73/7 75/5 84/2 93/20 98/5 100/5 101/16 102/16 102/25 103/20 104/3 104/14 105/12 106/5 107/23 108/6 108/16 108/25 109/15 112/4 116/13 121/10 122/1 126/12 131/15 134/3 136/17 136/23 141/12 142/15 145/7 147/23 154/17 158/10 160/8 168/18 169/8 170/1 175/21 179/9 192/14 194/21 196/23 197/3 198/2 198/17 MR. FOX: [87] 15/12 17/4 20/24 24/13 26/16 27/13 32/9 37/4 38/23 40/19 41/14 42/10 43/20 44/9 47/6 47/19 48/8 48/14 48/19 49/11 50/8 50/11 52/13 52/19 52/24 53/8 62/1 66/15 68/21 69/1 69/11 71/14 72/18 72/22 73/1 75/2 84/1 93/16 98/1 99/25 101/15 102/15 102/22 103/16 104/1 104/13 105/5 105/25 107/22 108/3 108/13 108/23 109/11 112/3 121/6 121/9 121/20 121/23 126/11 131/11 134/2 136/16 136/20 142/14 145/6 147/22 154/15 158/2 158/5 158/8 160/7 164/3 168/15 169/5 175/15 179/7 192/1 194/20 196/22 197/2 197/22 198/10 200/13 201/11 201/17 202/17 213/17 MS. HARBISON: [2] 201/15 202/6 MS. STEINER: [21] 50/16 51/12 62/5 71/9 72/16 72/24 73/3 83/17 83/23 116/7 121/22 141/3 142/9 154/12 158/7 164/8 168/17 169/7 169/22 200/12 218/20 THE COURT REPORTER: [2] 62/7 169/20 THE WITNESS: [43] 15/13 20/25 26/19 32/11 37/5 42/11 43/21 44/10 47/7 47/20 48/21 49/12 50/12 53/9 62/2 66/16 68/22 69/2 69/12 75/3 93/17 98/2 100/1 102/23 103/17 104/2 105/6 106/1 108/4 108/14 108/24 109/12 116/8 121/7 136/21 141/8 158/4 164/4 175/17 179/8 192/2 197/24 198/11	\$18 million [4] 200/1 214/19 217/19 218/7 \$250,000 [1] 47/12 \$26 [2] 181/16 181/23 \$26 million [2] 181/16 181/23 \$3 [1] 191/21 \$4,382.45 [1] 213/14 \$4,545.68 [1] 213/15 \$5,376.90 [1] 213/22 \$52 [3] 186/13 186/23 187/23 \$52 million [1] 186/23 \$7,193.64 [1] 213/25 \$820,000 [1] 47/9 \$914 [1] 51/23 \$914 million [1] 51/23 ' '20 [2] 77/3 189/7 '20/'21 [1] 77/3 '21 [6] 26/13 77/3 188/24 189/7 189/8 191/11 '22 [1] 182/16 '23 [1] 182/15 'nother [1] 77/23 0 0001492 [1] 184/5 000167 [1] 62/20 000181 [1] 64/1 000183 [2] 121/16 149/5 000197 [1] 149/15 000476 [1] 142/6 000478 [1] 142/8 001057 [3] 4/10 83/9 83/12 001350 [3] 4/9 71/21 168/17 01023 [1] 1/5 1 1 million [10] 29/13 34/16 45/14 46/4 46/22 46/22 49/6 49/7 186/17 200/6 10 [2] 4/16 169/25 100,000 [2] 193/7 193/10 108 [1] 3/23 11 [3] 4/17 202/16 202/17 111 [2] 219/6 219/24 1200 [1] 27/20 13 [1] 110/7 131 [1] 4/12 133 [1] 4/13 135,000 [1] 159/12 13th [1] 133/3 14.2 [1] 47/21 141 [1] 4/14 142 [1] 4/15 15 [4] 50/1 60/24 81/7 110/8 15,221,000 [1] 192/11 150 [2] 167/23 167/24 150,000 [1] 167/22 155 [2] 167/24 167/24 158,000 [2] 42/14 43/3 15th [1] 132/24 16 [1] 188/20 169 [1] 4/16 1725 [2] 25/25 38/15 175 [1] 159/21 178,000 [3] 41/9 42/6 42/21 18,221,000 [1] 192/12 183 [1] 121/24 1839A [1] 195/8 184 [2] 121/21 121/24	185 [1] 156/3 19 [8] 51/11 51/14 52/8 157/4 186/10 186/22 214/15 215/14 196300 [1] 3/24 1999 [2] 126/15 133/3 19th [2] 157/8 157/9 2 2.5 [2] 124/24 125/7 20 [3] 4/8 68/6 178/25 20 percent [1] 217/22 20,000 [4] 40/13 41/5 41/17 42/22 200 [1] 4/2 2004 [5] 126/7 132/3 132/8 132/12 132/19 2006 [1] 126/6 2008 [1] 132/24 2009 [1] 6/9 2011 [1] 6/13 2012 [1] 6/14 2013 [1] 6/15 2015 [2] 139/13 142/18 2017 [2] 22/14 22/15 2018 [2] 35/8 139/14 2019 [15] 6/20 6/20 7/21 35/8 51/11 51/14 52/8 56/10 135/20 136/4 138/17 205/17 213/21 214/6 215/16 2019-2020 [1] 4/7 2019/2020 [1] 14/20 202 [1] 4/17 2020 [64] 4/7 14/6 14/20 26/13 26/21 29/10 29/20 30/22 33/16 39/5 39/9 43/15 43/22 44/5 45/14 55/24 56/17 58/3 58/6 58/10 62/17 64/25 74/19 77/6 77/16 78/14 80/12 82/25 83/15 85/5 88/5 88/16 94/9 97/21 102/10 135/15 135/21 136/4 138/18 149/18 149/20 152/12 152/16 156/25 164/15 182/9 182/19 184/11 186/2 186/3 186/11 186/14 188/24 188/24 189/3 194/19 196/14 213/13 213/21 213/24 213/24 214/6 217/16 218/6 2020-2021 [1] 4/6 2020/2021 [1] 76/18 2021 [16] 4/6 14/18 14/20 15/5 26/21 39/1 58/10 76/18 168/23 182/9 186/4 186/5 194/19 196/10 196/10 213/14 2022 [2] 1/24 3/2 20th [1] 83/15 218 [1] 4/3 222 [1] 2/9 25 [2] 132/2 132/8 25th [2] 132/12 132/18 26 [2] 62/17 181/15 26 million [4] 180/20 181/2 181/13 182/5 2615 [1] 213/2 28th [3] 149/18 149/20 153/13 29 [1] 1/24 29th [7] 3/2 152/12 152/15 153/14 156/21 156/25 159/8 3 30 [1] 114/7 30 percent [1] 159/16 30-minute [1] 66/22 300 [2] 185/19 193/12 30th [1] 39/5 34 percent [2] 214/2 214/7 340M [1] 2/9
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<b>3</b> 350 [2] 159/23 160/6 350,000 [1] 160/1 37201 [1] 2/9 37206 [2] 3/13 3/19 37212 [1] 195/9 37219 [1] 3/24 3:20-CV-01023 [1] 1/5	academics [25] 55/20 57/9 57/24 58/2 75/14 77/21 78/3 78/9 78/15 78/17 78/21 78/24 79/23 79/24 80/4 80/18 81/1 81/3 82/6 82/17 83/2 85/11 166/3 166/23 167/5 access [5] 36/23 115/8 134/6 134/7 134/11 according [4] 46/14 139/12 143/14 144/2 account [10] 25/24 27/17 27/24 28/2 135/8 140/19 160/11 181/23 200/19 200/21 accurate [27] 14/1 19/25 23/9 34/20 35/15 37/14 38/9 49/20 57/19 57/20 67/3 68/23 68/25 72/10 76/10 76/16 79/2 79/19 80/9 130/2 182/8 185/2 185/7 185/10 217/10 217/18 219/10 achieve [5] 11/13 11/14 53/17 106/13 212/1 achievement [2] 11/25 14/25 across [2] 40/8 217/13 action [4] 67/12 100/19 128/16 219/15 actions [2] 21/16 103/23 actively [1] 15/16 activity [9] 103/15 103/18 104/12 105/4 105/7 105/23 108/12 108/22 109/9 actual [14] 35/11 35/16 35/18 36/12 48/23 61/9 67/18 78/4 123/24 159/17 187/21 189/5 189/11 217/22 actually [21] 7/8 35/24 45/8 55/18 70/8 71/5 73/8 79/14 115/22 116/9 157/22 160/5 160/18 171/6 174/18 182/1 183/4 189/9 195/3 211/2 212/21 add [2] 8/24 14/25 added [2] 111/4 159/10 adding [1] 148/7 addition [2] 66/4 77/1 additional [10] 48/6 52/6 52/17 53/2 54/5 117/10 151/5 159/17 160/6 194/10 address [2] 195/6 213/3 adds [1] 47/12 adequacy [2] 9/6 180/15 adequate [1] 125/1 administration [14] 6/8 13/10 23/5 54/6 59/22 60/19 77/20 137/10 137/14 139/13 139/18 143/3 146/5 194/7 administrations [6] 22/11 118/24 138/10 139/20 143/2 188/15 administrative [7] 173/17 173/18 173/20 177/25 178/12 178/13 178/16 adopted [1] 39/5 adoption [2] 76/20 77/2 ADRIENNE [4] 1/7 1/13 1/21 184/7 adult [1] 22/3 Advance [1] 131/5 advancements [1] 140/18 advertise [1] 57/15 advertised [2] 56/15 57/13 advice [5] 60/16 146/9 176/18 176/25 179/16 advise [4] 60/15 74/10 74/12 204/13 adviser [2] 139/24 143/21 advising [4] 65/6 73/9 81/15 118/9 advocating [1] 13/3 affairs [1] 6/7 affect [1] 114/17 affected [1] 195/22 affiliated [1] 218/8 afield [1] 213/18	African [6] 140/23 144/13 144/17 145/3 145/8 145/17 African-American [6] 140/23 144/13 144/17 145/3 145/8 145/17 after [10] 17/9 42/5 44/25 97/21 107/16 127/9 137/11 153/22 176/18 176/24 again [22] 46/9 70/5 75/15 77/10 83/4 83/11 85/23 88/11 93/5 96/18 96/22 96/24 119/14 122/24 127/13 132/25 138/4 149/2 156/15 156/23 190/13 203/7 against [12] 7/6 72/13 93/4 98/20 98/21 103/2 106/25 107/25 120/22 130/6 152/23 194/18 agencies [1] 61/4 agenda [8] 4/8 62/15 62/15 63/4 64/7 64/8 64/13 64/14 ago [2] 18/20 169/16 agree [21] 36/18 41/16 42/13 51/25 53/1 53/5 125/11 125/12 126/6 127/2 143/14 143/18 162/8 170/2 170/6 177/7 177/24 186/12 188/8 189/17 189/20 Agreed [1] 36/19 agreement [1] 186/6 ahead [1] 187/10 akin [1] 52/5 Alexander [8] 18/4 18/6 18/13 18/15 18/19 140/20 140/21 140/24 Alexander's [1] 18/8 align [1] 77/13 aligning [1] 75/13 alignment [4] 8/5 54/20 75/24 76/8 aligns [1] 79/20 all [71] 3/3 3/4 11/24 27/6 27/22 28/25 39/22 45/20 49/23 50/3 51/1 51/4 61/19 66/18 68/7 68/17 76/16 79/2 79/2 80/13 82/1 82/12 83/5 83/5 94/9 94/23 99/7 101/22 104/10 105/7 106/11 108/4 113/22 114/11 115/17 115/19 120/20 126/4 126/19 128/18 129/19 132/23 141/13 146/17 148/22 151/21 153/7 158/13 158/25 161/11 161/14 162/24 167/4 172/2 174/3 176/10 183/20 186/18 189/14 190/22 191/13 192/3 192/8 199/12 199/15 199/17 205/13 206/23 207/24 209/20 216/10 allocation [1] 194/11 allow [2] 70/12 70/12 allowed [3] 69/23 70/3 70/7 almost [5] 62/22 95/14 99/1 176/7 189/14 alone [1] 48/22 along [2] 60/11 117/18 alongside [2] 53/20 53/24 already [12] 54/13 59/16 107/5 128/3 152/16 165/22 165/24 170/25 171/2 210/15 210/23 212/17 also [31] 11/17 25/17 41/2 59/22 66/3 69/5 75/12 77/1 77/22 78/7 81/8 81/11 93/24 102/4 122/25 127/23 132/19 136/24 143/4 144/17 151/5 153/7 155/18 159/6 176/20 176/22 178/9 179/25 188/12 190/19 200/7 always [11] 37/8 44/23 49/18 49/23 50/1 50/5 50/6 50/14 85/7 99/1 180/11 am [18] 15/3 21/22 28/17 51/9 70/17 112/25 171/8 176/22 185/9 198/11 205/21 211/24 214/3 214/16 215/22
<b>4</b> 40 [1] 154/13 40 percent [1] 197/1 40,000 [1] 159/19 400 [2] 145/13 145/14 4:00 p.m [1] 184/9	account [10] 25/24 27/17 27/24 28/2 135/8 140/19 160/11 181/23 200/19 200/21 accurate [27] 14/1 19/25 23/9 34/20 35/15 37/14 38/9 49/20 57/19 57/20 67/3 68/23 68/25 72/10 76/10 76/16 79/2 79/19 80/9 130/2 182/8 185/2 185/7 185/10 217/10 217/18 219/10 achieve [5] 11/13 11/14 53/17 106/13 212/1 achievement [2] 11/25 14/25 across [2] 40/8 217/13 action [4] 67/12 100/19 128/16 219/15 actions [2] 21/16 103/23 actively [1] 15/16 activity [9] 103/15 103/18 104/12 105/4 105/7 105/23 108/12 108/22 109/9 actual [14] 35/11 35/16 35/18 36/12 48/23 61/9 67/18 78/4 123/24 159/17 187/21 189/5 189/11 217/22 actually [21] 7/8 35/24 45/8 55/18 70/8 71/5 73/8 79/14 115/22 116/9 157/22 160/5 160/18 171/6 174/18 182/1 183/4 189/9 195/3 211/2 212/21 add [2] 8/24 14/25 added [2] 111/4 159/10 adding [1] 148/7 addition [2] 66/4 77/1 additional [10] 48/6 52/6 52/17 53/2 54/5 117/10 151/5 159/17 160/6 194/10 address [2] 195/6 213/3 adds [1] 47/12 adequacy [2] 9/6 180/15 adequate [1] 125/1 administration [14] 6/8 13/10 23/5 54/6 59/22 60/19 77/20 137/10 137/14 139/13 139/18 143/3 146/5 194/7 administrations [6] 22/11 118/24 138/10 139/20 143/2 188/15 administrative [7] 173/17 173/18 173/20 177/25 178/12 178/13 178/16 adopted [1] 39/5 adoption [2] 76/20 77/2 ADRIENNE [4] 1/7 1/13 1/21 184/7 adult [1] 22/3 Advance [1] 131/5 advancements [1] 140/18 advertise [1] 57/15 advertised [2] 56/15 57/13 advice [5] 60/16 146/9 176/18 176/25 179/16 advise [4] 60/15 74/10 74/12 204/13 adviser [2] 139/24 143/21 advising [4] 65/6 73/9 81/15 118/9 advocating [1] 13/3 affairs [1] 6/7 affect [1] 114/17 affected [1] 195/22 affiliated [1] 218/8 afield [1] 213/18	against [12] 7/6 72/13 93/4 98/20 98/21 103/2 106/25 107/25 120/22 130/6 152/23 194/18 agencies [1] 61/4 agenda [8] 4/8 62/15 62/15 63/4 64/7 64/8 64/13 64/14 ago [2] 18/20 169/16 agree [21] 36/18 41/16 42/13 51/25 53/1 53/5 125/11 125/12 126/6 127/2 143/14 143/18 162/8 170/2 170/6 177/7 177/24 186/12 188/8 189/17 189/20 Agreed [1] 36/19 agreement [1] 186/6 ahead [1] 187/10 akin [1] 52/5 Alexander [8] 18/4 18/6 18/13 18/15 18/19 140/20 140/21 140/24 Alexander's [1] 18/8 align [1] 77/13 aligning [1] 75/13 alignment [4] 8/5 54/20 75/24 76/8 aligns [1] 79/20 all [71] 3/3 3/4 11/24 27/6 27/22 28/25 39/22 45/20 49/23 50/3 51/1 51/4 61/19 66/18 68/7 68/17 76/16 79/2 79/2 80/13 82/1 82/12 83/5 83/5 94/9 94/23 99/7 101/22 104/10 105/7 106/11 108/4 113/22 114/11 115/17 115/19 120/20 126/4 126/19 128/18 129/19 132/23 141/13 146/17 148/22 151/21 153/7 158/13 158/25 161/11 161/14 162/24 167/4 172/2 174/3 176/10 183/20 186/18 189/14 190/22 191/13 192/3 192/8 199/12 199/15 199/17 205/13 206/23 207/24 209/20 216/10 allocation [1] 194/11 allow [2] 70/12 70/12 allowed [3] 69/23 70/3 70/7 almost [5] 62/22 95/14 99/1 176/7 189/14 alone [1] 48/22 along [2] 60/11 117/18 alongside [2] 53/20 53/24 already [12] 54/13 59/16 107/5 128/3 152/16 165/22 165/24 170/25 171/2 210/15 210/23 212/17 also [31] 11/17 25/17 41/2 59/22 66/3 69/5 75/12 77/1 77/22 78/7 81/8 81/11 93/24 102/4 122/25 127/23 132/19 136/24 143/4 144/17 151/5 153/7 155/18 159/6 176/20 176/22 178/9 179/25 188/12 190/19 200/7 always [11] 37/8 44/23 49/18 49/23 50/1 50/5 50/6 50/14 85/7 99/1 180/11 am [18] 15/3 21/22 28/17 51/9 70/17 112/25 171/8 176/22 185/9 198/11 205/21 211/24 214/3 214/16 215/22
<b>5</b> 5,300 [1] 196/24 5/26/20 [1] 4/8 50 [1] 4/6 50 million [1] 187/21 52 [2] 4/7 188/3 52 million [3] 186/16 187/5 187/23 5350 [1] 2/10 5th [2] 184/11 186/3	achieve [5] 11/13 11/14 53/17 106/13 212/1 achievement [2] 11/25 14/25 across [2] 40/8 217/13 action [4] 67/12 100/19 128/16 219/15 actions [2] 21/16 103/23 actively [1] 15/16 activity [9] 103/15 103/18 104/12 105/4 105/7 105/23 108/12 108/22 109/9 actual [14] 35/11 35/16 35/18 36/12 48/23 61/9 67/18 78/4 123/24 159/17 187/21 189/5 189/11 217/22 actually [21] 7/8 35/24 45/8 55/18 70/8 71/5 73/8 79/14 115/22 116/9 157/22 160/5 160/18 171/6 174/18 182/1 183/4 189/9 195/3 211/2 212/21 add [2] 8/24 14/25 added [2] 111/4 159/10 adding [1] 148/7 addition [2] 66/4 77/1 additional [10] 48/6 52/6 52/17 53/2 54/5 117/10 151/5 159/17 160/6 194/10 address [2] 195/6 213/3 adds [1] 47/12 adequacy [2] 9/6 180/15 adequate [1] 125/1 administration [14] 6/8 13/10 23/5 54/6 59/22 60/19 77/20 137/10 137/14 139/13 139/18 143/3 146/5 194/7 administrations [6] 22/11 118/24 138/10 139/20 143/2 188/15 administrative [7] 173/17 173/18 173/20 177/25 178/12 178/13 178/16 adopted [1] 39/5 adoption [2] 76/20 77/2 ADRIENNE [4] 1/7 1/13 1/21 184/7 adult [1] 22/3 Advance [1] 131/5 advancements [1] 140/18 advertise [1] 57/15 advertised [2] 56/15 57/13 advice [5] 60/16 146/9 176/18 176/25 179/16 advise [4] 60/15 74/10 74/12 204/13 adviser [2] 139/24 143/21 advising [4] 65/6 73/9 81/15 118/9 advocating [1] 13/3 affairs [1] 6/7 affect [1] 114/17 affected [1] 195/22 affiliated [1] 218/8 afield [1] 213/18	ago [2] 18/20 169/16 agree [21] 36/18 41/16 42/13 51/25 53/1 53/5 125/11 125/12 126/6 127/2 143/14 143/18 162/8 170/2 170/6 177/7 177/24 186/12 188/8 189/17 189/20 Agreed [1] 36/19 agreement [1] 186/6 ahead [1] 187/10 akin [1] 52/5 Alexander [8] 18/4 18/6 18/13 18/15 18/19 140/20 140/21 140/24 Alexander's [1] 18/8 align [1] 77/13 aligning [1] 75/13 alignment [4] 8/5 54/20 75/24 76/8 aligns [1] 79/20 all [71] 3/3 3/4 11/24 27/6 27/22 28/25 39/22 45/20 49/23 50/3 51/1 51/4 61/19 66/18 68/7 68/17 76/16 79/2 79/2 80/13 82/1 82/12 83/5 83/5 94/9 94/23 99/7 101/22 104/10 105/7 106/11 108/4 113/22 114/11 115/17 115/19 120/20 126/4 126/19 128/18 129/19 132/23 141/13 146/17 148/22 151/21 153/7 158/13 158/25 161/11 161/14 162/24 167/4 172/2 174/3 176/10 183/20 186/18 189/14 190/22 191/13 192/3 192/8 199/12 199/15 199/17 205/13 206/23 207/24 209/20 216/10 allocation [1] 194/11 allow [2] 70/12 70/12 allowed [3] 69/23 70/3 70/7 almost [5] 62/22 95/14 99/1 176/7 189/14 alone [1] 48/22 along [2] 60/11 117/18 alongside [2] 53/20 53/24 already [12] 54/13 59/16 107/5 128/3 152/16 165/22 165/24 170/25 171/2 210/15 210/23 212/17 also [31] 11/17 25/17 41/2 59/22 66/3 69/5 75/12 77/1 77/22 78/7 81/8 81/11 93/24 102/4 122/25 127/23 132/19 136/24 143/4 144/17 151/5 153/7 155/18 159/6 176/20 176/22 178/9 179/25 188/12 190/19 200/7 always [11] 37/8 44/23 49/18 49/23 50/1 50/5 50/6 50/14 85/7 99/1 180/11 am [18] 15/3 21/22 28/17 51/9 70/17 112/25 171/8 176/22 185/9 198/11 205/21 211/24 214/3 214/16 215/22
<b>6</b> 6,000 [1] 196/17 6,665 [1] 196/10 613 [1] 3/13 615 [1] 2/10 68251 [1] 3/19	actual [14] 35/11 35/16 35/18 36/12 48/23 61/9 67/18 78/4 123/24 159/17 187/21 189/5 189/11 217/22 actually [21] 7/8 35/24 45/8 55/18 70/8 71/5 73/8 79/14 115/22 116/9 157/22 160/5 160/18 171/6 174/18 182/1 183/4 189/9 195/3 211/2 212/21 add [2] 8/24 14/25 added [2] 111/4 159/10 adding [1] 148/7 addition [2] 66/4 77/1 additional [10] 48/6 52/6 52/17 53/2 54/5 117/10 151/5 159/17 160/6 194/10 address [2] 195/6 213/3 adds [1] 47/12 adequacy [2] 9/6 180/15 adequate [1] 125/1 administration [14] 6/8 13/10 23/5 54/6 59/22 60/19 77/20 137/10 137/14 139/13 139/18 143/3 146/5 194/7 administrations [6] 22/11 118/24 138/10 139/20 143/2 188/15 administrative [7] 173/17 173/18 173/20 177/25 178/12 178/13 178/16 adopted [1] 39/5 adoption [2] 76/20 77/2 ADRIENNE [4] 1/7 1/13 1/21 184/7 adult [1] 22/3 Advance [1] 131/5 advancements [1] 140/18 advertise [1] 57/15 advertised [2] 56/15 57/13 advice [5] 60/16 146/9 176/18 176/25 179/16 advise [4] 60/15 74/10 74/12 204/13 adviser [2] 139/24 143/21 advising [4] 65/6 73/9 81/15 118/9 advocating [1] 13/3 affairs [1] 6/7 affect [1] 114/17 affected [1] 195/22 affiliated [1] 218/8 afield [1] 213/18	all [71] 3/3 3/4 11/24 27/6 27/22 28/25 39/22 45/20 49/23 50/3 51/1 51/4 61/19 66/18 68/7 68/17 76/16 79/2 79/2 80/13 82/1 82/12 83/5 83/5 94/9 94/23 99/7 101/22 104/10 105/7 106/11 108/4 113/22 114/11 115/17 115/19 120/20 126/4 126/19 128/18 129/19 132/23 141/13 146/17 148/22 151/21 153/7 158/13 158/25 161/11 161/14 162/24 167/4 172/2 174/3 176/10 183/20 186/18 189/14 190/22 191/13 192/3 192/8 199/12 199/15 199/17 205/13 206/23 207/24 209/20 216/10 allocation [1] 194/11 allow [2] 70/12 70/12 allowed [3] 69/23 70/3 70/7 almost [5] 62/22 95/14 99/1 176/7 189/14 alone [1] 48/22 along [2] 60/11 117/18 alongside [2] 53/20 53/24 already [12] 54/13 59/16 107/5 128/3 152/16 165/22 165/24 170/25 171/2 210/15 210/23 212/17 also [31] 11/17 25/17 41/2 59/22 66/3 69/5 75/12 77/1 77/22 78/7 81/8 81/11 93/24 102/4 122/25 127/23 132/19 136/24 143/4 144/17 151/5 153/7 155/18 159/6 176/20 176/22 178/9 179/25 188/12 190/19 200/7 always [11] 37/8 44/23 49/18 49/23 50/1 50/5 50/6 50/14 85/7 99/1 180/11 am [18] 15/3 21/22 28/17 51/9 70/17 112/25 171/8 176/22 185/9 198/11 205/21 211/24 214/3 214/16 215/22
<b>7</b> 7,193.64 [1] 196/17 7,761,000 [1] 51/18 71 [1] 4/8 714-5350 [1] 2/10 72 [1] 4/9 75 percent [1] 104/11	add [2] 8/24 14/25 added [2] 111/4 159/10 adding [1] 148/7 addition [2] 66/4 77/1 additional [10] 48/6 52/6 52/17 53/2 54/5 117/10 151/5 159/17 160/6 194/10 address [2] 195/6 213/3 adds [1] 47/12 adequacy [2] 9/6 180/15 adequate [1] 125/1 administration [14] 6/8 13/10 23/5 54/6 59/22 60/19 77/20 137/10 137/14 139/13 139/18 143/3 146/5 194/7 administrations [6] 22/11 118/24 138/10 139/20 143/2 188/15 administrative [7] 173/17 173/18 173/20 177/25 178/12 178/13 178/16 adopted [1] 39/5 adoption [2] 76/20 77/2 ADRIENNE [4] 1/7 1/13 1/21 184/7 adult [1] 22/3 Advance [1] 131/5 advancements [1] 140/18 advertise [1] 57/15 advertised [2] 56/15 57/13 advice [5] 60/16 146/9 176/18 176/25 179/16 advise [4] 60/15 74/10 74/12 204/13 adviser [2] 139/24 143/21 advising [4] 65/6 73/9 81/15 118/9 advocating [1] 13/3 aff	



<b>A</b>		
am... [3] 219/13 219/15 219/18	applicant [4] 117/7 120/16 130/14 130/17	184/1 185/19 188/25 194/25 194/25 196/12
American [6] 140/23 144/13 144/17 145/3 145/8 145/17	applicants [9] 7/6 7/10 7/14 7/20 15/21 56/16 114/25 122/9 170/14	art [2] 27/25 145/1
amount [16] 12/9 23/24 41/25 52/1 124/21 160/12 181/16 182/6 188/8 188/9 189/12 195/25 197/20 197/22 197/24 215/25	application [17] 4/12 7/2 115/7 115/17 115/18 116/18 120/4 123/21 123/24 127/6 129/17 133/15 141/8 149/2 183/1 183/3 208/22	as [137] 3/3 3/4 5/2 5/3 6/20 8/3 9/19 12/17 18/12 18/20 18/23 22/1 22/3 25/25 28/22 32/3 33/5 33/8 33/8 33/9 34/13 34/13 34/24 36/21 44/23 44/23 45/4 45/4 50/20 52/12 53/12 54/7 54/14 54/14 54/18 54/19 54/21 54/21 54/23 57/2 59/10 59/15 59/16 71/10 71/13 72/21 73/24 73/25 74/14 80/2 80/4 80/13 80/20 80/24 80/25 81/13 81/14 82/1 83/18 83/22 83/24 90/8 91/2 91/2 93/13 103/7 110/13 110/14 111/17 112/9 112/10 113/24 120/8 131/14 133/19 133/23 134/1 137/12 138/9 141/7 141/11 142/13 142/17 143/25 144/4 148/6 161/8 161/14 162/6 162/16 163/25 164/2 164/9 164/19 164/20 165/25 168/21 169/21 169/25 170/14 173/12 174/25 174/25 178/13 178/14 178/21 185/15 186/9 187/17 187/17 187/19 187/20 189/18 189/21 192/13 197/19 199/15 201/4 202/16 203/2 203/2 203/11 203/12 203/15 205/21 205/23 206/6 208/8 209/7 210/2 211/20 212/4 215/20 215/20 217/13 219/19 219/20
amounts [1] 189/3	applications [1] 15/8	Ashford [38] 4/12 4/14 4/15 112/16 116/14 117/19 117/22 119/12 119/15 119/19 120/6 120/8 121/5 121/13 123/3 123/17 130/1 131/10 131/23 134/17 135/9 137/16 138/16 141/23 145/22 146/1 148/10 149/2 149/3 150/24 151/21 152/17 153/10 154/1 154/5 157/22 167/10 176/1
analogous [1] 176/8	applied [8] 6/25 97/3 112/15 113/2 113/3 129/18 178/25 209/20	ask [51] 5/23 9/22 22/5 24/15 26/25 27/5 27/16 29/4 29/11 31/13 39/15 40/5 47/4 48/10 49/2 49/7 63/8 69/24 70/20 89/25 101/1 109/4 114/9 114/13 114/16 114/18 115/11 121/24 123/25 131/21 134/19 146/13 161/24 162/21 165/21 166/2 170/16 174/2 176/10 184/13 184/22 185/21 187/7 189/25 193/25 194/10 194/16 201/17 203/1 206/15 209/18
analyzed [1] 45/10	applies [1] 147/20	asked [40] 6/23 8/15 9/23 14/23 24/9 31/9 35/2 35/15 42/19 48/5 48/20 49/10 49/13 52/16 61/19 71/6 80/16 97/2 98/10 104/4 105/15 106/16 106/16 106/21 106/23 116/1 123/7 123/9 146/9 146/11 162/4 165/15 176/13 179/11 181/5 181/7 189/20 199/22 201/8 216/13
Ann [2] 3/11 9/19	apply [20] 8/2 8/12 8/16 17/2 96/3 97/2 115/4 119/20 124/22 146/2 146/12 146/14 146/22 148/16 148/19 182/1 203/16 205/3 207/16 209/14	asking [28] 30/18 31/25 34/6 34/6 34/14 35/10 35/23 43/9 52/2 70/9 88/15 88/15 95/13 98/3 105/19 105/19 105/21 106/22 122/19 125/21 129/16 129/20 144/15 146/21 178/16 178/17 178/18 217/6
anonymous [3] 172/7 172/9 172/11	applying [2] 16/11 142/3	asks [3] 6/24 14/5 147/6
another [12] 24/5 25/17 71/18 73/1 95/2 99/20 101/13 132/8 151/2 158/16 203/23 212/22	appointed [2] 7/8 7/11	aspect [1] 204/23
answer [29] 10/6 33/21 40/23 44/4 50/14 51/6 53/10 67/14 89/1 89/17 90/16 91/25 96/25 98/20 100/3 100/23 103/18 108/8 109/17 109/19 110/10 123/9 126/10 164/7 175/16 193/16 203/23 205/5 216/12	appointment [4] 7/3 7/5 133/20 151/8	aspects [3] 199/13 199/16 199/16
answered [4] 48/20 74/14 119/3 214/16	appraisal [1] 197/14	aspirational [13] 11/16 11/21 12/2 12/12 12/17 12/22 13/12 13/19 13/24 22/22 23/6 23/12 33/6
answering [3] 32/10 49/4 105/7	approach [1] 191/6	assessed [1] 196/25
answers [2] 128/1 147/3	appropriate [1] 67/11	assessment [1] 196/6
any [112] 7/14 12/21 13/11 15/8 16/4 21/15 21/24 21/25 29/9 29/14 29/18 30/21 32/1 32/8 32/12 32/25 33/19 33/22 36/25 41/3 41/11 42/3 44/7 45/2 45/7 49/9 51/5 57/1 59/7 61/4 61/8 61/21 63/16 64/17 65/8 65/11 67/15 67/16 68/15 76/15 80/11 81/16 82/7 82/22 84/16 85/17 86/3 86/9 86/16 86/21 86/23 89/21 89/23 90/1 90/7 91/22 92/24 94/19 96/15 98/4 98/16 100/17 101/5 103/4 106/13 116/2 119/5 120/5 120/24 123/4 123/21 125/22 125/23 129/24 129/25 130/6 136/10 138/14 145/21 148/3 155/24 156/7 156/12 161/25 162/10 162/19 165/6 165/9 165/13 165/14 165/15 171/16 171/19 171/22 173/13 175/2 175/8 175/14 179/10 179/14 180/12 182/23 194/13 197/7 198/18 198/19 199/7 199/9 203/3 213/15 219/14 219/15	approval [3] 67/9 67/11 183/22	assessor [1] 20/1
anybody [6] 48/11 128/25 137/4 147/20 156/2 163/14	approve [6] 68/20 69/4 69/9 70/23 70/23 183/10	assistant [2] 79/7 79/7
anyone [35] 12/20 15/8 15/10 30/20 32/22 32/22 32/24 33/16 33/17 41/23 41/24 43/15 43/16 44/5 44/6 46/19 47/4 48/10 49/7 57/2 106/21 119/18 120/20 146/19 148/19 150/6 152/21 153/1 153/5 165/15 170/16 171/3 197/8 199/22 217/3	approved [23] 10/25 13/20 13/24 39/17 88/1 95/20 95/21 181/18 181/18 181/19 182/4 182/6 182/11 182/24 183/3 183/5 183/7 183/13 183/23 216/4 216/5 216/6 216/8	
anyplace [1] 47/17	approves [1] 12/6	
anything [33] 9/23 21/16 21/21 21/24 28/9 39/16 59/12 71/2 75/1 86/19 92/2 100/7 100/9 100/10 100/13 100/14 101/8 101/20 114/16 129/9 129/14 140/20 161/12 176/5 177/9 190/5 192/18 198/22 198/25 199/3 210/18 212/14 218/13	approving [2] 70/17 70/17	
anyway [1] 196/21	approximate [1] 167/20	
apiece [2] 159/12 159/21	approximately [1] 186/13	
appealed [2] 95/24 95/25	April [3] 51/11 51/14 52/8	
appear [2] 52/7 185/2	April 19 [2] 51/14 52/8	
APPEARANCES [1] 3/7	are [133] 3/4 3/5 5/13 5/25 7/8 10/4 11/19 11/20 11/24 15/1 15/16 15/25 19/3 19/9 23/16 24/9 24/20 25/2 25/5 25/10 25/15 27/6 31/17 32/19 33/18 34/9 36/10 39/20 43/22 44/16 44/22 46/8 47/9 47/18 49/8 50/22 53/13 54/3 60/2 62/11 62/24 63/19 64/12 66/23 67/1 69/24 75/22 78/2 78/13 79/4 80/2 80/3 82/3 82/13 84/4 84/7 84/12 86/3 91/3 95/19 95/21 95/24 95/24 96/3 97/9 97/10 100/6 100/21 100/25 101/3 101/24 102/4 104/4 104/8 104/21 104/25 107/18 108/4 112/21 113/21 116/2 122/2 122/18 123/14 123/22 128/15 131/7 132/23 135/5 137/13 139/25 140/16 143/8 143/16 144/21 144/23 144/24 147/5 153/13 153/15 160/19 161/20 163/3 163/15 163/25 165/22 172/11 174/10 177/18 178/14 178/18 180/3 180/15 186/6 186/20 187/1 187/10 187/11 189/12 190/11 190/14 192/2 194/11 197/11 199/16 201/21 203/3 204/3 205/19 206/2 212/20 214/14 217/24	
appearing [1] 100/21	area [10] 24/5 25/9 33/1 33/19 45/7 49/9 49/25 61/12 64/19 179/15	
	areas [17] 18/12 24/4 24/9 24/25 25/15 31/17 31/24 32/7 32/19 34/2 47/18 53/2 53/6 190/20 190/25 197/17 197/18	
	aren't [7] 25/22 63/10 106/7 113/20 113/25 191/3 192/17	
	around [15] 26/20 54/2 69/3 88/25 101/4 114/7 118/10 144/16 181/4	

**A**  
associate [45] 30/6 32/4 37/23 37/24  
54/9 54/24 55/2 55/5 55/13 56/2 56/2  
58/7 58/20 59/1 59/4 59/8 60/3 60/9  
60/12 61/23 73/10 73/16 73/19 74/18  
75/7 79/10 80/12 80/16 81/16 81/23  
84/4 84/11 101/23 102/11 103/7  
104/22 105/16 108/10 108/21 109/8  
164/18 179/20 189/18 199/7 199/8  
Associates [1] 2/8  
assume [17] 37/5 40/22 40/24 65/5  
66/7 83/1 88/20 88/21 90/22 94/15  
113/17 117/17 136/4 142/4 153/22  
155/9 211/22  
assumed [1] 192/12  
assumes [1] 190/4  
assuming [2] 90/5 152/15  
assumption [3] 192/15 192/16 193/20  
assumptions [2] 191/24 193/23  
asteiner [1] 3/14  
athletics [2] 14/16 14/24  
attach [1] 141/17  
attend [4] 23/10 23/11 23/17 63/1  
attended [1] 69/17  
attention [3] 47/9 74/2 123/7  
attorney [8] 3/12 3/18 101/18 126/9  
201/8 201/20 202/10 202/11  
attractive [1] 20/23  
attribute [1] 176/9  
attributed [1] 172/12  
audio [2] 152/6 158/19  
audit [1] 28/24  
available [2] 22/25 182/5  
Avenue [5] 2/9 195/9 212/23 213/1  
213/3  
award [1] 217/21  
awarded [2] 217/17 218/6  
aware [41] 20/14 22/4 39/6 42/3 42/3  
63/15 100/10 100/12 100/17 101/8  
101/19 101/24 102/4 102/8 102/23  
103/4 103/6 103/10 103/13 104/2  
111/15 113/1 123/5 130/7 146/17  
152/4 163/19 171/8 171/25 172/4  
172/16 173/14 176/20 176/22 179/2  
197/11 210/12 215/22 217/24 218/3  
218/4  
away [5] 54/7 146/21 148/25 166/12  
166/15  
awful [1] 194/6

**B**  
back [57] 10/5 11/7 11/17 17/6 21/19  
22/6 27/7 33/15 38/21 41/9 43/13  
45/22 55/23 58/3 68/5 78/10 87/15  
95/23 96/2 98/17 101/24 124/17  
124/18 125/20 128/20 130/10 144/9  
146/8 151/17 152/6 152/13 152/19  
153/12 156/3 156/18 157/2 157/12  
157/17 161/2 165/21 182/2 183/20  
188/24 191/7 191/13 192/9 194/9  
194/13 196/19 202/10 205/13 211/4  
212/18 213/11 215/6 215/17 215/19  
background [41] 6/3 16/25 17/16 17/17  
17/18 114/9 114/17 114/22 115/14  
115/15 116/24 123/5 128/13 128/14  
128/21 129/1 129/6 129/15 133/14  
133/19 144/15 147/11 149/12 149/17  
149/25 150/3 150/6 150/11 150/13  
150/15 150/19 150/23 150/25 151/3  
153/9 153/14 153/16 153/18 203/20

211/12 216/4  
backwards [1] 186/5  
BAILEY [8] 1/16 3/9 89/2 90/2 90/5  
90/14 90/18 164/8  
Bailey's [1] 88/1  
balance [4] 19/7 19/14 188/1 188/4  
balanced [1] 187/16  
Ball [1] 203/15  
bank [1] 181/23  
Barnes [4] 71/25 165/2 172/14 172/24  
Barry [10] 24/20 24/21 32/23 33/17  
40/24 45/13 48/11 52/15 155/10  
160/13  
based [7] 33/10 99/22 133/10 181/19  
187/3 199/7 199/9  
basic [2] 51/21 113/10  
basically [4] 33/14 61/15 76/23 138/16  
basing [3] 137/7 137/8 143/8  
basis [1] 66/6  
Bates [8] 27/11 71/21 142/5 149/4  
149/15 168/16 168/22 169/5  
battle [90] 1/7 1/13 1/21 6/23 7/1 8/15  
16/14 16/18 31/6 53/20 56/18 60/12  
61/13 61/15 61/17 65/14 65/25 66/3  
66/7 67/5 69/15 70/3 70/7 70/16 70/18  
73/9 73/20 74/8 79/11 81/16 81/20  
81/22 82/22 84/7 84/9 84/11 84/13  
84/15 84/17 85/19 86/8 87/1 87/1 87/3  
87/20 88/2 88/8 88/18 89/3 90/19  
91/15 94/19 94/22 96/7 96/17 96/23  
97/13 98/17 99/16 99/19 100/6 100/11  
101/4 101/11 102/11 103/14 103/22  
104/5 105/2 108/7 108/9 108/19 109/7  
112/10 120/6 153/1 154/4 164/24  
170/17 170/19 170/23 171/16 172/6  
184/7 184/19 198/18 208/23 210/1  
210/11 212/15  
Battle's [3] 6/21 48/3 88/2  
be [217] 6/4 6/16 8/7 8/8 10/2 10/3  
11/15 11/19 11/25 12/9 12/17 12/18  
13/24 16/2 16/10 16/25 17/7 17/16  
18/10 19/6 19/8 19/12 20/17 21/7  
21/12 22/22 22/24 23/3 24/3 24/24  
25/1 25/7 25/7 25/10 25/22 25/25 26/3  
26/6 27/24 27/25 27/25 28/7 28/16  
29/6 29/7 31/18 32/13 34/2 34/7 34/10  
36/11 40/24 42/2 42/22 43/18 44/7  
44/14 44/23 44/24 45/3 45/11 45/19  
48/25 50/25 51/4 57/20 60/8 60/9  
60/17 62/3 65/20 67/12 69/5 69/23  
70/3 70/4 70/7 72/11 75/19 76/5 79/1  
79/1 81/17 82/13 83/23 84/14 85/1  
85/6 85/10 86/7 89/10 91/24 93/15  
94/16 95/2 96/2 96/11 96/14 97/17  
97/17 101/7 102/12 102/13 102/20  
102/23 103/22 105/8 105/10 107/3  
107/12 107/15 107/20 111/2 113/5  
113/6 117/9 117/11 120/3 120/3  
120/10 120/12 120/16 123/8 127/23  
130/4 130/11 130/23 131/17 131/21  
131/22 133/9 135/6 137/21 138/2  
138/11 138/15 138/24 139/2 145/9  
145/15 146/7 147/17 147/18 151/20  
153/22 155/9 158/16 158/17 158/24  
159/2 159/19 159/21 160/14 160/25  
164/5 164/25 165/2 166/1 173/10  
173/20 175/22 176/21 178/7 178/13  
179/16 179/16 180/11 181/14 182/12  
183/1 184/19 185/2 185/15 187/14  
187/18 187/25 188/1 188/9 189/11

191/3 191/7 191/23 192/5 192/7  
192/12 192/17 193/3 193/8 193/9  
193/15 194/2 194/4 194/6 197/25  
198/14 199/23 201/9 203/22 204/6  
204/20 205/16 205/17 206/17 207/9  
209/13 209/21 211/15 211/16 211/21  
211/24 212/7 213/16 216/4 216/6  
216/7 216/7 216/8  
bearing [2] 38/7 138/18  
beat [2] 97/24 137/10  
beats [1] 96/10  
became [5] 166/3 166/5 166/7 167/6  
168/4  
because [67] 5/9 9/18 9/24 12/11 19/13  
21/13 23/22 31/3 31/24 33/5 33/20  
33/25 40/13 43/14 49/10 55/10 67/4  
67/12 70/10 71/6 75/9 77/4 78/23 86/4  
88/20 89/4 94/3 98/21 99/19 100/13  
101/8 102/20 103/23 106/2 110/13  
115/16 120/21 128/16 131/1 137/7  
139/11 143/4 152/22 157/12 161/12  
161/17 176/25 177/1 179/4 179/14  
179/19 185/13 186/2 187/25 188/11  
189/9 192/7 192/12 192/16 203/9  
207/1 207/5 210/14 212/6 212/8  
215/11 216/25  
becoming [2] 81/21 168/7  
been [85] 5/2 6/21 14/17 15/4 15/9  
15/20 31/5 31/5 31/6 33/11 33/13  
34/13 35/20 37/7 38/20 41/25 45/8  
48/3 49/21 49/22 50/23 52/16 56/9  
67/11 72/22 74/24 76/19 77/2 81/19  
82/24 83/9 88/21 91/14 104/6 115/12  
117/9 118/5 121/2 123/23 125/22  
126/13 127/1 127/22 127/25 129/13  
138/22 148/13 149/21 150/10 151/6  
151/8 155/14 159/11 159/15 163/8  
167/3 167/8 171/22 174/22 175/2  
175/5 175/12 175/22 175/24 176/23  
179/13 183/6 183/11 183/13 183/23  
184/14 186/3 186/10 190/5 193/6  
193/19 193/21 194/6 203/14 203/17  
210/5 210/10 210/15 210/23 211/2  
before [46] 7/21 7/22 9/1 12/19 17/10  
20/11 35/19 43/18 44/8 44/13 44/17  
45/5 45/12 63/22 66/10 80/13 97/17  
100/22 114/14 117/24 118/1 118/2  
118/20 119/2 119/5 129/22 135/17  
138/6 141/25 147/18 152/17 153/10  
153/16 153/23 180/12 183/4 183/23  
196/4 196/18 196/20 196/24 197/13  
202/19 205/13 212/21 214/17  
beginning [8] 62/6 113/1 182/14 182/18  
182/21 182/24 193/14 195/21  
behind [1] 11/15  
being [34] 18/23 23/12 30/16 39/11  
41/17 41/21 50/13 63/17 69/25 75/25  
77/5 82/12 85/24 86/6 86/9 93/11 95/5  
104/4 104/21 105/15 140/13 160/21  
162/6 162/11 171/20 171/20 172/7  
194/12 195/10 200/8 205/12 206/14  
207/14 208/9  
believe [59] 7/24 9/11 14/18 17/20  
17/25 19/23 21/23 29/2 30/4 39/2  
52/22 56/17 56/19 57/19 57/19 59/23  
74/14 87/22 88/3 88/11 88/19 88/22  
89/8 91/6 94/6 96/19 97/1 97/3 102/9  
103/4 107/21 110/12 110/25 111/7  
111/11 111/22 114/21 115/13 117/14  
118/7 118/14 124/19 138/8 140/4

<b>B</b>	138/25 bring [3] 43/24 146/7 162/5 bringing [2] 47/8 161/20 broad [2] 39/18 55/3 broader [3] 170/22 184/16 184/18 broadest [1] 53/15 broken [1] 143/16 Bronze [1] 24/21 Brook [4] 158/4 202/4 202/4 202/7 Brooks [1] 3/22 brooks.fox [1] 3/25 brother [5] 87/1 87/2 88/2 94/20 94/23 brother's [1] 103/24 brought [7] 93/18 123/7 138/14 161/21 170/18 187/14 187/19 budget [186] 4/6 4/7 10/13 10/16 10/17 10/22 10/24 11/3 11/5 11/6 11/9 11/16 11/18 11/22 12/2 12/12 12/23 13/13 13/19 13/24 22/6 22/8 22/22 23/6 23/12 23/17 23/20 23/21 24/3 24/8 24/9 24/15 24/17 24/24 25/4 25/6 25/24 25/25 26/6 26/13 26/21 28/1 28/17 28/19 29/1 29/3 29/5 29/10 29/14 29/19 29/19 29/21 29/24 30/2 30/9 30/10 30/14 30/19 30/21 30/23 31/11 31/14 31/16 31/17 31/18 31/18 31/23 32/1 32/18 32/25 33/5 33/6 34/17 35/4 35/5 35/6 36/1 37/3 37/9 37/22 38/2 38/5 38/7 38/13 38/22 39/5 39/11 39/12 39/16 39/20 39/24 40/13 40/18 40/25 41/3 41/5 41/8 41/18 42/1 42/6 42/7 42/16 42/17 42/18 42/19 42/23 43/2 43/3 43/8 43/11 43/16 43/22 43/23 43/24 44/6 44/18 44/24 45/3 45/10 45/23 45/24 45/24 46/10 47/21 47/23 48/22 49/8 49/16 49/18 50/2 50/4 50/7 50/15 50/17 50/23 51/11 51/14 51/24 53/21 61/20 68/1 69/4 74/15 74/19 74/22 74/25 75/7 110/4 154/18 154/19 155/4 155/7 155/17 155/22 160/15 168/10 168/11 181/17 181/19 182/4 182/7 184/9 186/4 186/6 186/19 187/9 187/11 187/12 187/16 188/14 188/17 188/21 188/24 189/3 190/2 190/12 190/15 191/2 191/8 192/8 193/4 194/9 199/18 199/21 199/23 199/24 budgetary [2] 54/13 180/8 budgeted [2] 181/15 187/18 budgeting [2] 188/12 192/2 budgets [8] 27/1 27/2 29/12 32/13 33/10 39/17 39/21 68/15 build [4] 119/25 123/12 215/5 218/11 building [3] 77/2 214/25 215/18 buildings [1] 187/1 built [2] 24/3 34/12 bunch [2] 9/22 82/10 Buntin [1] 3/11 bureaucracy [1] 77/22 bus [2] 45/18 46/8 business [6] 65/16 123/11 130/13 130/16 131/8 138/6	call [9] 5/10 22/21 25/3 27/23 36/16 178/20 179/13 206/2 216/21 called [18] 5/2 6/18 24/16 25/15 25/17 28/9 57/23 63/20 93/7 130/9 130/15 131/4 135/18 136/19 137/17 152/3 158/14 180/11 calling [1] 151/9 calls [1] 99/4 came [19] 6/9 6/14 50/25 72/1 90/3 90/10 92/10 118/21 119/2 136/5 138/6 141/15 161/12 165/10 182/12 187/23 201/7 203/21 217/22 campaign [4] 118/9 118/12 119/4 119/10 campaigns [2] 21/25 22/1 campus [1] 186/10 can [80] 16/5 24/4 24/8 26/7 26/11 26/14 29/4 31/23 33/1 33/19 36/18 42/19 45/7 45/14 46/22 47/5 48/1 48/18 49/9 50/16 51/9 51/10 51/14 53/18 59/6 62/12 66/24 71/16 71/17 73/4 74/10 75/6 80/19 81/9 84/3 96/4 100/2 107/19 107/24 109/16 109/19 110/6 110/10 110/21 121/4 121/11 121/12 125/17 127/19 129/13 131/16 131/18 134/5 136/8 141/20 141/21 148/25 150/25 156/7 157/16 157/20 157/25 158/7 166/7 178/13 180/5 184/2 185/6 191/3 191/12 201/2 201/19 202/6 206/5 206/14 206/15 206/21 207/3 207/10 212/19 can't [21] 17/20 25/18 59/18 59/24 65/2 65/6 68/7 68/16 69/19 72/2 86/10 88/14 89/17 99/5 101/18 137/3 146/9 170/22 172/22 172/22 210/3 candidate [9] 121/13 130/19 133/13 147/9 147/11 147/15 148/1 149/21 203/12 candidates [5] 120/1 128/15 129/18 134/14 212/16 cannot [6] 41/2 69/20 100/8 145/12 196/3 197/12 capital [3] 28/8 28/9 47/10 caption [1] 3/3 card [1] 131/3 care [5] 105/24 122/9 122/12 122/13 180/2 cared [1] 204/4 Carolina [1] 173/3 Carrie [1] 167/17 case [13] 1/7 5/10 7/9 9/5 9/7 93/18 95/14 109/7 127/17 131/18 149/23 178/14 219/16 cases [1] 39/22 Cash [4] 130/9 130/15 131/4 131/4 casual [1] 132/2 category [3] 50/7 102/12 102/18 CATHEY [9] 1/17 3/16 9/21 91/11 91/14 102/13 199/1 199/10 200/17 caught [1] 156/11 cause [1] 106/19 caused [2] 8/12 176/2 central [33] 29/13 29/23 33/9 46/3 46/7 46/8 46/11 46/12 46/13 46/21 47/10 59/12 63/20 64/21 65/3 65/9 66/9 67/6 67/25 68/2 68/10 71/2 71/7 148/5 160/5 178/20 180/12 185/12 185/13 185/15 185/17 192/22 193/11 centralized [1] 47/11 CEO [1] 174/24
<b>C</b>	C-R-U-M-B-O [1] 37/20 cabinet [5] 74/1 164/11 164/16 164/22 164/23 calendar [8] 86/17 152/14 157/2 157/13 157/14 157/19 158/1 158/17 caliber [1] 120/2	



C	Chris [17] 24/19 24/22 31/4 31/9 32/1 32/23 33/17 45/13 46/19 48/11 63/6 148/4 148/18 160/13 172/14 172/24 200/5 circumstances [1] 177/23 citizens [1] 198/9 city [12] 35/1 118/6 140/14 140/17 140/18 143/12 148/15 187/3 187/13 187/16 187/19 194/25 city's [1] 187/23 civil [2] 3/3 161/13 claimed [3] 111/24 137/17 138/5 claims [1] 138/3 clarification [2] 6/24 14/5 clarify [8] 10/14 37/8 38/21 62/2 77/18 100/24 112/21 125/5 classified [1] 18/10 classroom [4] 79/6 80/23 94/4 189/16 CLAY [15] 1/24 3/1 5/1 5/7 5/10 5/17 5/17 5/19 26/11 44/3 73/8 153/24 153/25 200/16 201/6 clear [8] 21/12 60/18 70/22 82/12 85/4 91/5 181/14 204/25 clearer [1] 85/10 client [1] 36/13 close [1] 204/14 closed [1] 187/1 closer [1] 61/1 clue [1] 159/6 clues [1] 210/13 coach [21] 87/1 87/2 87/20 88/2 88/2 88/7 88/18 89/3 89/11 90/19 95/2 95/5 96/6 96/9 96/10 96/11 96/13 96/14 96/17 96/23 97/13 coached [1] 96/8 coaches [2] 97/5 97/24 coaching [2] 95/7 95/13 Cohn [3] 97/4 97/18 97/20 collaborative [1] 83/6 collating [1] 64/9 colleague [2] 162/7 162/11 collect [1] 197/13 collected [2] 197/22 197/24 collective [3] 4/17 34/11 202/17 college [3] 21/19 21/20 22/1 combination [5] 22/24 38/11 54/12 55/19 74/15 combined [9] 55/18 55/21 57/11 57/17 57/22 58/12 80/2 80/5 85/11 combining [2] 57/8 57/9 come [18] 8/2 18/2 31/21 61/4 65/17 74/1 87/15 98/11 130/12 133/21 146/2 151/13 170/10 190/22 192/4 192/5 196/12 200/24 comes [5] 114/21 115/15 168/9 168/10 188/14 coming [1] 85/22 command [2] 74/3 76/6 comment [5] 12/5 77/18 148/12 212/11 212/12 comments [2] 94/19 148/4 commiserate [1] 168/7 commission [1] 96/4 committee [1] 161/4 committees [1] 21/16 common [3] 9/18 13/23 143/1 commonly [2] 187/12 212/10 communicate [5] 81/4 99/5 99/8 99/10 99/12 communicates [1] 147/12	communication [2] 75/11 85/10 communities [3] 6/19 118/10 195/23 community [8] 61/3 79/9 92/15 95/4 140/15 164/19 170/22 179/19 comp [1] 140/5 company [9] 130/9 131/3 131/4 135/18 136/19 137/17 137/22 137/22 138/3 comparable [1] 60/9 compared [2] 60/3 191/23 comparison [2] 59/11 195/3 comparisons [1] 59/7 compensation [1] 191/14 compete [1] 7/5 competence [1] 162/20 competent [1] 162/16 complained [7] 90/25 91/12 93/25 94/2 94/8 102/20 108/21 complains [2] 101/25 212/5 complaint [4] 93/4 93/6 107/16 152/24 complaints [3] 91/22 103/3 107/13 complete [1] 216/3 complexities [1] 206/24 complicated [3] 31/3 206/19 206/20 component [3] 116/19 160/23 208/24 components [3] 53/22 53/23 54/2 comprehensive [4] 31/2 214/23 215/18 215/21 Comptroller [1] 6/10 computer [4] 155/12 155/14 155/23 157/6 concentrating [1] 116/10 concentration [3] 144/13 144/17 145/22 concept [3] 163/20 207/3 207/5 concern [1] 171/19 conditions [1] 173/7 conducted [4] 153/7 157/3 210/10 210/16 conducting [1] 174/10 conferred [1] 170/17 confident [1] 185/10 conflict [1] 63/16 confused [4] 127/5 127/20 127/23 186/1 confusing [2] 10/2 166/12 congress [1] 182/25 connected [3] 20/16 95/17 107/20 connection [3] 21/14 82/1 135/7 connections [3] 19/10 20/18 20/22 consent [1] 132/13 conservative [2] 191/5 194/12 consider [1] 160/14 consideration [4] 68/17 97/4 98/7 212/13 considered [12] 7/10 7/19 8/21 97/17 97/20 102/11 102/19 103/14 103/22 105/3 108/12 120/4 considering [1] 7/14 consistency [2] 85/16 85/18 consistent [3] 78/6 82/13 85/4 consolidated [2] 55/21 75/13 constant [1] 12/24 consult [1] 104/4 consultation [1] 184/16 consulted [1] 104/21 consulting [2] 73/9 138/9 contact [20] 8/13 12/21 12/24 17/3 18/3 29/4 30/21 31/1 31/10 31/14 32/22 33/17 44/6 119/19 119/24 146/13 146/20 170/10 170/16 171/3 contacted [13] 8/14 8/15 17/10 17/10
---	---	--

<p>C</p> <p>contacted... [9] 29/10 29/19 31/8 31/9 31/13 32/1 42/4 146/1 170/13</p> <p>contacting [6] 16/15 16/20 30/25 99/20 151/12 176/17</p> <p>contacts [1] 158/25</p> <p>contemplating [1] 146/7</p> <p>contest [1] 196/6</p> <p>context [4] 33/4 38/10 42/18 123/15</p> <p>contextual [1] 210/13</p> <p>continue [1] 139/19</p> <p>continued [4] 173/2 173/2 173/8 176/21</p> <p>continuous [2] 59/23 151/8</p> <p>contract [32] 16/21 42/22 43/4 73/17 87/21 97/10 156/3 162/22 163/5 163/14 163/16 163/24 212/20 214/14 214/18 216/5 216/13 216/13 216/15 216/15 216/16 216/17 216/17 216/22 216/25 217/4 217/12 217/16 217/21 217/25 218/7 218/16</p> <p>contracted [4] 40/7 45/6 45/9 45/19</p> <p>contractor [1] 41/21</p> <p>contracts [10] 10/12 10/12 10/15 59/25 64/12 64/12 138/14 163/11 163/13 187/1</p> <p>contribute [1] 64/20</p> <p>control [1] 138/20</p> <p>controversy [2] 215/8 215/13</p> <p>conversation [7] 106/7 148/7 152/9 208/1 209/5 210/11 212/15</p> <p>conversations [3] 156/16 200/1 200/4</p> <p>convey [1] 13/1</p> <p>conveying [1] 128/5</p> <p>convicted [9] 115/12 125/22 126/13 127/1 127/22 127/25 132/9 132/12 132/25</p> <p>Cooper [2] 137/10 139/1</p> <p>coordinate [2] 11/1 217/14</p> <p>copies [1] 112/6</p> <p>copy [1] 157/25</p> <p>core [1] 14/24</p> <p>correct [153] 8/19 10/18 12/14 13/15 13/17 13/18 19/22 20/2 20/5 20/16 23/8 23/21 23/25 24/5 24/7 27/3 27/3 27/8 29/2 29/5 30/10 30/15 34/18 37/13 38/8 46/8 46/13 46/17 47/15 51/19 51/24 54/24 55/2 57/18 58/8 58/9 58/13 58/15 58/18 61/14 62/20 62/23 63/4 65/4 67/8 74/5 74/6 76/11 76/15 77/7 77/8 77/9 77/17 78/10 78/15 78/16 78/20 83/15 83/19 84/9 89/11 94/7 98/24 99/17 100/22 106/9 110/2 110/3 110/4 110/5 111/6 111/7 111/9 112/11 112/13 123/18 124/11 125/15 125/17 125/19 126/23 126/24 131/24 134/22 135/3 136/1 139/10 141/18 142/20 142/21 142/22 142/24 143/7 144/1 144/3 144/5 145/3 145/10 147/16 148/2 150/25 152/17 153/15 160/9 163/22 165/7 165/13 166/25 169/17 173/17 173/22 174/1 176/25 177/3 177/15 178/3 178/12 180/1 182/7 182/10 185/25 186/14 188/25 189/4 189/6 189/12 193/7 194/3 194/19 195/16 196/11 199/14 205/14 207/7 208/23 212/22 213/10 213/22 213/25 214/2 214/7 214/20 215/5 215/7 216/14 216/16 217/5 217/17 217/20 218/8 218/9 218/11 218/12</p> <p>correctly [4] 30/17 85/15 195/20 214/3</p>	<p>cost [3] 159/11 159/23 193/8</p> <p>could [59] 6/2 12/12 12/18 16/25 17/16 18/24 19/1 24/25 29/3 29/11 29/21 30/22 31/11 31/18 41/11 42/8 42/14 43/18 44/7 44/20 48/7 48/12 52/17 53/1 70/12 70/14 70/16 72/16 81/17 82/23 85/6 85/10 97/17 99/10 99/12 120/21 127/20 127/23 135/3 139/1 141/3 145/8 157/5 158/17 158/23 177/11 186/16 190/1 190/3 199/15 199/23 200/20 201/15 202/4 202/5 204/20 207/9 210/5 212/6</p> <p>couldn't [4] 5/20 99/8 158/15 173/8</p> <p>council [4] 13/9 21/3 194/10 198/12</p> <p>counsel [5] 3/1 13/1 165/17 171/14 219/14</p> <p>counted [1] 185/15</p> <p>counting [1] 48/22</p> <p>country [1] 145/14</p> <p>county [6] 1/7 1/13 1/20 195/4 197/17 219/3</p> <p>county's [1] 197/16</p> <p>couple [7] 18/16 99/2 154/22 166/2 166/21 184/13 200/17</p> <p>course [9] 66/23 69/4 73/23 84/20 130/12 159/18 175/23 175/25 187/15</p> <p>court [9] 1/1 6/24 9/8 14/4 62/5 127/17 219/6 219/19 219/20</p> <p>Courthouse [1] 3/23</p> <p>covers [1] 190/19</p> <p>COVID [12] 180/16 180/16 180/20 181/3 181/13 186/10 186/22 214/15 214/19 214/22 214/23 215/14</p> <p>COVID-19 [3] 186/10 186/22 214/15</p> <p>coworkers [1] 207/6</p> <p>create [7] 19/16 57/10 57/11 80/3 165/14 176/8 204/4</p> <p>created [4] 62/11 71/24 72/4 116/12</p> <p>creating [3] 139/15 140/13 146/10</p> <p>credit [2] 131/3 139/14</p> <p>Creek [3] 89/5 89/5 164/9</p> <p>crime [1] 115/12</p> <p>criminal [12] 114/17 114/19 122/5 122/10 126/14 127/15 131/18 146/24 147/14 152/16 153/9 153/16</p> <p>crisis [4] 74/22 199/19 199/22 199/24</p> <p>cross [1] 101/5</p> <p>crossed [1] 207/12</p> <p>crucial [1] 36/12</p> <p>Crumbo [2] 37/18 37/20</p> <p>cry [1] 206/1</p> <p>cultural [1] 212/7</p> <p>culture [1] 204/4</p> <p>current [5] 35/20 35/21 76/17 77/5 189/13</p> <p>currently [4] 14/3 16/12 136/14 139/22</p> <p>curriculum [14] 54/21 75/18 75/19 75/24 75/25 76/2 76/4 76/21 76/22 78/3 78/8 78/9 79/21 145/19</p> <p>custodial [1] 187/1</p> <p>cut [41] 24/9 24/25 29/4 31/24 32/19 33/1 33/8 33/11 33/18 33/19 34/1 34/3 34/16 35/3 35/12 37/2 37/21 44/16 44/20 45/1 45/5 45/7 45/11 45/15 45/18 45/21 46/13 46/20 48/1 49/8 49/16 49/18 50/6 180/9 180/10 180/11 180/12 190/5 190/6 192/12 217/13</p> <p>cuts [20] 29/21 30/22 31/11 31/15 32/6 32/15 32/17 33/13 34/8 42/20 43/18 44/7 44/13 45/12 45/15 45/18 49/22</p>	<p>49/24 50/25 189/10</p> <p>cutting [4] 33/4 37/9 44/8 47/4</p> <p>CV [2] 1/5 5/20</p> <p>D</p> <p>Dads [1] 93/1</p> <p>DAMON [6] 1/17 3/16 91/11 91/14 102/13 199/10</p> <p>date [7] 39/6 62/17 152/11 153/23 156/19 182/13 189/4</p> <p>dated [2] 168/23 184/11</p> <p>dates [2] 86/18 153/13</p> <p>daughter [1] 173/11</p> <p>David [3] 58/5 79/24 82/25</p> <p>DAVIDSON [5] 1/7 1/13 1/20 195/4 219/3</p> <p>day [13] 151/15 152/3 152/17 153/7 153/8 157/21 158/11 158/13 158/14 158/16 158/17 158/23 216/11</p> <p>deal [3] 10/19 22/7 206/23</p> <p>dealing [6] 14/2 22/6 22/16 145/9 206/2 206/24</p> <p>dealt [2] 145/17 161/18</p> <p>Dean [2] 160/25 161/4</p> <p>debating [1] 158/22</p> <p>debt [1] 187/22</p> <p>December [2] 213/24 215/16</p> <p>decide [5] 113/22 120/18 151/19 174/3 188/13</p> <p>decided [3] 61/16 120/19 158/24</p> <p>deciding [1] 78/12</p> <p>decision [18] 19/18 32/12 53/24 60/11 60/14 70/14 87/20 88/1 88/17 89/21 90/2 111/25 138/18 140/16 173/9 179/11 194/13 194/14</p> <p>decision-maker [1] 111/25</p> <p>decision-making [1] 140/16</p> <p>decisions [2] 165/16 190/7</p> <p>decreased [1] 42/22</p> <p>deeply [2] 180/2 204/4</p> <p>defendant [2] 71/5 111/24</p> <p>Defendants [4] 1/8 1/14 1/22 3/22</p> <p>defer [1] 85/19</p> <p>define [1] 49/24</p> <p>defined [1] 183/25</p> <p>definitely [2] 124/19 178/2</p> <p>definitions [1] 164/6</p> <p>degree [4] 117/7 124/13 124/18 125/5</p> <p>degrees [2] 6/6 6/8</p> <p>deliberation [2] 8/23 12/8</p> <p>deliberative [1] 209/23</p> <p>delivered [1] 79/5</p> <p>delivering [1] 76/22</p> <p>Demand [1] 1/5</p> <p>democratic [5] 21/21 21/23 119/13 119/16 144/1</p> <p>Democrats [1] 21/20</p> <p>demonstrated [1] 16/2</p> <p>denied [1] 95/25</p> <p>Denise [1] 150/15</p> <p>Dennis [1] 168/14</p> <p>deny [1] 213/15</p> <p>department [25] 3/23 6/11 21/4 24/8 24/16 24/17 24/19 25/21 26/4 27/23 28/4 28/6 28/13 31/10 32/23 42/20 43/17 49/8 54/4 63/13 140/9 161/12 163/9 163/12 199/23</p> <p>department's [1] 185/22</p> <p>departmental [1] 185/22</p> <p>departments [5] 24/22 25/15 60/8 79/4</p>
---	--	---

D	168/8 168/12 170/11 172/7 177/14 178/21 178/21 180/6 189/22 199/8 202/20 203/12 203/16 203/18 204/19 208/4 208/9 208/22 209/2 209/9 210/22 211/4 211/23 212/16 director's [1] 111/13 directors [37] 55/1 56/1 58/11 58/19 73/15 74/5 77/7 77/17 77/24 78/5 78/22 79/15 79/18 79/20 80/7 80/7 80/10 81/7 81/14 82/4 82/23 84/4 85/12 109/24 110/7 110/16 110/19 112/1 113/14 166/20 167/4 169/1 179/12 204/25 208/19 210/23 210/24 disagree [1] 214/8 disconnected [1] 107/18 discrimination [1] 101/25 discuss [8] 12/23 66/2 67/6 199/12 199/18 208/21 208/25 217/11 discussed [4] 68/5 92/2 210/3 217/7 discussing [5] 61/22 105/8 164/21 169/16 209/12 discussion [11] 5/15 26/9 65/8 67/24 68/1 68/10 68/15 70/21 172/5 202/8 208/7 discussions [6] 84/16 98/16 120/5 145/21 165/7 197/7 disparities [1] 102/21 disparity [4] 91/1 103/3 107/13 107/17 disposal [1] 47/11 dispute [1] 40/3 disqualifying [1] 123/8 Disruption [1] 51/11 distinction [1] 23/4 district [32] 1/1 1/1 6/17 7/24 8/6 18/21 19/5 25/3 25/5 53/17 57/12 65/16 70/11 87/23 88/4 88/14 90/4 90/11 90/16 95/13 95/15 95/21 95/24 115/19 176/21 177/5 177/11 179/5 189/10 194/8 194/9 194/15 district-run [2] 95/13 95/15 districts [1] 194/24 diverse [2] 140/14 140/15 diversity [31] 112/18 114/5 116/22 116/25 118/6 118/9 124/10 124/15 124/23 136/8 139/4 139/7 139/15 142/17 143/6 143/21 145/10 145/12 148/8 154/21 155/1 160/22 160/25 161/5 161/8 161/11 161/15 161/25 165/12 167/9 170/4 division [5] 1/2 25/19 25/20 25/21 162/23 do [319] docs [1] 160/5 doctorate [1] 117/17 document [29] 4/9 32/16 32/20 46/14 46/24 50/19 51/10 52/11 64/16 71/12 71/18 71/22 71/24 72/9 72/20 83/21 121/4 131/13 133/25 141/6 142/12 152/18 160/10 169/4 169/24 184/5 184/14 184/23 202/15 documentation [2] 116/5 181/20 documents [16] 13/11 50/13 51/4 51/5 61/20 62/9 63/14 64/10 64/10 64/20 71/1 71/6 71/7 86/16 155/18 155/20 DOE [50] 1/3 3/10 36/16 36/20 38/17 39/23 40/12 41/4 42/4 93/3 93/6 93/9 93/17 93/19 94/2 94/6 112/15 112/23 112/24 115/25 116/15 117/12 120/21 133/17 146/13 149/25 150/3 151/6 151/9 151/12 151/22 151/23 151/24	152/2 152/9 152/22 153/3 154/6 154/19 155/21 158/11 158/18 160/24 161/22 170/2 176/3 176/18 177/4 177/24 199/3 Doe's [4] 42/15 53/3 53/7 93/13 does [46] 7/4 9/18 10/25 11/9 11/22 14/2 14/13 14/14 16/12 17/19 17/23 28/15 40/18 55/21 66/3 66/6 80/18 94/14 94/25 96/2 100/4 100/11 112/23 113/7 115/11 117/19 121/13 122/16 135/9 135/10 146/25 147/2 147/12 152/12 167/25 168/2 185/2 205/18 205/21 205/23 205/25 206/1 206/4 207/1 211/9 217/8 doesn't [20] 23/22 70/10 84/13 101/4 101/6 101/9 106/2 107/5 109/2 112/2 124/3 128/3 135/22 137/23 138/12 160/11 169/7 177/14 186/11 200/23 doing [10] 10/24 13/1 110/21 111/5 130/13 134/14 160/17 172/2 180/3 193/22 dollars [5] 186/20 187/3 188/19 189/6 190/2 don't [175] 7/5 7/19 8/21 8/22 8/22 9/23 13/19 17/11 17/25 18/10 19/1 20/3 20/6 20/7 20/17 20/20 21/23 24/2 26/17 33/22 37/6 39/25 39/25 40/15 40/22 40/23 42/7 42/11 43/10 43/14 44/24 45/15 49/3 49/12 50/2 50/3 51/3 53/10 56/17 57/21 64/5 64/15 65/1 65/6 66/20 67/22 68/4 69/12 69/18 70/11 70/12 70/22 71/25 74/7 80/13 81/4 81/5 81/11 86/1 88/11 88/11 88/19 88/23 88/25 89/12 89/15 89/23 90/3 90/11 90/16 92/10 92/12 93/2 96/25 97/1 97/5 97/15 97/19 97/22 98/4 98/9 98/12 100/3 100/14 104/20 105/11 105/14 105/24 106/6 109/5 109/13 111/19 111/22 111/23 113/19 113/24 116/3 116/3 116/9 116/11 119/7 126/9 126/21 128/4 129/16 130/24 133/12 134/18 135/6 135/6 136/6 136/10 136/10 136/14 136/21 136/22 137/7 137/19 137/25 140/8 141/15 146/15 146/18 146/19 147/14 148/12 148/17 151/5 153/18 153/21 154/3 156/9 157/4 161/20 163/14 164/6 165/6 165/9 167/23 170/20 170/20 172/16 174/7 174/17 175/19 176/15 178/4 178/15 183/10 188/13 189/19 192/7 192/18 196/13 197/25 198/13 199/16 204/25 205/5 205/25 207/1 207/13 207/22 208/11 208/15 208/20 209/2 209/24 210/20 211/1 211/5 211/6 211/10 214/8 218/13 done [15] 13/5 54/11 54/12 56/11 56/14 106/19 106/24 119/1 123/6 133/18 147/11 148/21 150/10 153/19 153/22 doubt [2] 162/11 162/19 doubted [2] 162/14 177/4 down [30] 26/17 26/18 27/5 33/14 35/13 37/2 37/22 45/25 51/16 62/19 100/8 121/21 121/23 127/16 127/21 135/11 149/7 181/19 181/20 185/6 192/9 195/3 195/11 195/15 195/19 196/15 196/17 196/19 214/1 214/10 dozens [1] 174/25 DR [98] 1/7 1/9 1/13 1/16 1/16 1/17 1/21 3/9 3/9 3/10 3/16 5/17 6/21 6/23
---	--	---



D	60/17 74/15 80/3 efficient [4] 44/23 45/4 54/18 199/19 effort [1] 83/5 either [9] 62/15 70/3 78/23 79/7 96/4 167/24 183/23 187/8 210/5 elaborate [1] 100/12 electric [2] 17/22 17/23 elementary [3] 169/1 203/17 203/19 elements [1] 61/2 eligible [4] 97/10 97/14 181/16 182/14 eliminate [15] 36/1 48/13 53/3 60/6 60/12 74/11 75/4 86/4 104/7 104/9 104/10 104/22 105/16 107/15 108/1 eliminated [14] 36/5 53/7 69/25 74/17 74/24 75/8 75/9 87/24 91/9 93/11 103/7 103/11 108/11 110/1 eliminating [4] 32/25 54/9 61/23 180/6 elimination [9] 38/8 60/4 68/20 69/10 73/10 104/5 148/5 199/6 199/13 Elisa [5] 204/11 205/10 207/17 208/8 208/17 else [24] 32/24 44/18 46/23 47/5 47/17 86/19 100/7 106/17 106/25 112/11 129/9 129/15 146/19 147/19 148/19 150/7 153/1 158/12 164/24 171/3 176/5 184/21 212/14 217/3 elsewhere [1] 191/4 emergency [4] 99/3 194/11 216/15 216/17 emotional [7] 204/7 204/23 205/11 205/19 206/4 206/13 206/14 employed [1] 203/4 employee [7] 28/6 28/23 63/13 114/23 176/21 191/14 219/14 employees [20] 115/16 115/19 116/11 162/25 163/1 163/3 163/13 179/25 180/2 185/11 204/4 204/8 204/23 205/12 206/14 206/17 206/19 206/22 207/4 212/12 employment [2] 136/9 143/11 enact [1] 53/15 end [5] 62/22 115/6 137/14 186/14 216/11 ended [14] 8/24 56/20 57/7 57/9 138/25 160/21 162/2 171/23 173/9 176/24 177/1 193/18 204/20 207/14 engaged [8] 103/15 104/11 105/3 105/23 108/12 108/22 109/9 117/23 enjoyed [1] 162/11 enough [1] 170/7 ensure [3] 54/19 60/25 110/19 enter [1] 122/16 entering [1] 34/23 entire [7] 42/18 44/11 47/20 76/17 118/6 124/20 194/15 entirely [1] 76/21 entitled [1] 195/6 entity [1] 218/7 equates [2] 125/4 125/7 equation [1] 187/11 equity [19] 112/19 114/5 116/23 116/25 118/6 118/9 124/23 136/8 139/5 139/7 139/15 142/18 143/6 148/8 160/22 165/11 167/10 170/4 170/4 equivalent [3] 17/21 35/24 46/15 error [2] 193/23 193/24 estimate [2] 159/16 191/22 estimates [1] 187/14 estimating [1] 191/20 et [5] 72/15 147/13 186/25 199/20	212/3 evaluation [1] 174/10 Evan [3] 16/8 16/15 16/20 even [16] 8/12 18/2 23/16 33/7 57/4 83/6 83/6 105/24 116/11 137/6 138/14 145/17 153/10 190/15 197/14 197/15 event [2] 132/23 215/14 eventually [1] 56/20 ever [21] 9/1 16/10 49/21 69/16 91/22 92/2 92/17 94/12 98/2 98/19 100/17 115/11 126/13 162/14 162/22 171/9 171/19 175/11 175/14 198/18 208/7 every [13] 5/9 9/17 12/15 13/16 23/14 31/14 50/2 50/4 50/6 51/22 51/25 66/22 191/1 everybody [2] 123/13 180/13 everybody's [3] 197/14 197/15 198/14 everyday [1] 75/20 everyone [2] 9/18 158/12 everything [12] 12/12 13/23 28/21 34/25 42/18 76/23 177/13 183/19 187/9 209/4 212/19 215/17 evidenced [1] 219/20 evolved [1] 204/12 exact [6] 9/10 17/8 23/23 24/7 168/19 176/7 exactly [8] 18/21 25/23 46/24 69/2 146/6 187/17 187/18 187/19 Examination [6] 4/2 4/2 4/3 5/4 200/15 218/14 example [13] 25/10 41/20 43/10 64/11 72/14 86/1 86/11 185/14 186/24 190/21 193/18 195/16 206/16 except [2] 3/4 205/2 exchange [1] 132/2 exchanges [1] 13/7 excuse [9] 37/23 79/7 121/22 151/11 163/2 166/17 189/7 194/25 211/10 executive [93] 55/1 55/3 55/12 56/1 58/11 58/19 59/17 59/21 60/5 73/15 74/4 77/7 77/17 77/24 78/5 78/22 79/8 79/15 79/18 79/19 80/7 80/7 80/10 81/7 81/14 82/4 82/19 82/23 84/3 85/12 90/8 90/12 90/13 91/19 93/13 109/23 110/7 110/15 110/18 111/8 111/13 111/18 112/1 112/18 113/14 113/15 114/5 136/7 148/7 159/9 160/21 164/20 165/11 166/5 166/9 166/14 166/16 166/20 167/1 167/4 167/9 167/12 167/13 167/25 168/1 168/8 168/8 168/12 169/1 170/3 170/11 172/6 178/21 179/12 189/21 202/20 203/12 203/16 203/17 204/19 204/25 208/4 208/9 208/18 208/22 209/2 209/9 210/22 210/23 210/24 211/4 211/23 212/16 exhibit [34] 50/17 50/20 52/8 52/12 71/10 71/13 72/17 72/21 73/2 83/18 83/22 83/24 131/9 131/14 133/23 134/1 141/4 141/7 141/11 142/10 142/13 145/5 165/22 165/22 165/25 166/1 168/21 169/15 169/21 169/25 202/7 202/13 202/16 202/17 EXHIBITS [1] 4/5 exist [1] 137/23 existed [1] 182/23 existing [1] 19/15 exists [2] 137/6 139/23 expand [2] 209/1 209/23 expanded [2] 57/11 168/4
E		
e-mail [4] 13/5 13/7 202/4 202/5 e-mailing [2] 176/24 177/1 e-mails [2] 36/25 37/6 each [11] 8/1 31/16 32/17 61/18 67/7 78/1 82/15 98/22 99/6 99/8 164/17 earlier [14] 33/5 74/14 106/12 112/23 112/23 144/15 156/20 157/3 159/7 166/18 191/9 200/18 208/6 214/13 early [1] 139/14 easier [2] 81/3 82/16 easiest [1] 108/1 easily [1] 127/20 east [1] 196/21 easy [2] 110/14 110/21 educating [2] 75/23 110/15 education [10] 6/11 6/12 21/4 22/18 34/9 79/5 124/4 198/13 198/13 215/19 educational [1] 144/14 EEOC [1] 116/4 effect [1] 37/6 effective [1] 54/19 efficiencies [7] 50/5 52/1 57/8 57/12		

<b>E</b>	few [2] 111/10 134/10 fewer [1] 82/5 field [2] 18/22 18/24 fight [1] 87/10 figure [4] 11/6 12/1 20/21 31/14 figures [2] 23/23 24/8 figuring [1] 183/1 file [1] 94/6 filed [1] 123/21 fill [8] 15/1 19/9 19/11 56/11 56/14 84/23 114/25 209/21 filled [5] 55/16 57/5 58/14 191/3 192/17 filling [3] 16/5 84/17 193/18 final [3] 41/8 45/24 50/17 finance [5] 12/25 12/25 22/18 22/19 37/17 finances [3] 25/2 130/13 131/7 financial [3] 23/22 28/24 131/5 financially [1] 219/15 find [19] 5/21 6/2 24/8 27/12 40/6 45/14 46/22 47/5 47/24 48/6 48/12 49/9 50/5 50/14 52/16 53/1 101/12 116/17 128/12 finding [1] 12/9 fine [7] 16/17 26/25 26/25 72/25 109/6 109/21 202/2 finish [2] 32/9 175/15 finished [1] 214/17 fire [7] 87/20 106/16 106/17 106/21 106/23 107/4 107/12 Firefly [5] 40/10 41/17 41/25 42/7 156/3 first [21] 5/2 7/24 34/23 38/25 49/23 50/3 51/16 52/2 62/11 79/2 124/1 162/24 170/18 170/23 170/23 181/17 182/3 186/18 186/22 207/14 210/4 fiscal [15] 26/12 28/24 35/3 39/1 45/24 186/2 186/4 186/5 186/14 187/10 189/6 189/7 189/7 189/14 191/11 fiscally [1] 188/11 fit [3] 209/11 209/17 212/7 five [8] 6/17 46/3 46/13 46/15 46/20 47/22 48/25 49/8 floor [1] 101/2 fluff [3] 44/18 44/20 44/24 focus [8] 19/6 19/7 19/7 110/14 117/25 145/25 206/18 216/12 focused [3] 116/19 140/4 140/12 folder [1] 121/6 follow [3] 6/9 100/13 207/25 following [2] 173/6 219/21 follows [1] 5/3 force [2] 161/1 161/8 Ford [1] 3/17 forecasted [1] 187/17 foregoing [1] 219/9 Forgive [1] 28/10 form [55] 3/4 15/12 17/4 20/24 37/4 40/19 41/14 42/10 43/20 44/9 47/6 47/19 48/8 48/14 48/19 49/11 50/11 52/19 52/24 53/8 62/1 68/21 69/1 69/11 75/2 75/10 93/16 98/1 99/25 101/15 102/15 102/22 103/16 104/1 104/13 105/5 105/25 107/22 108/3 108/13 108/23 109/11 112/3 116/7 126/11 136/16 136/20 147/22 160/7 164/3 179/7 192/1 194/20 197/2 198/10 Formal [1] 61/11 formalities [1] 3/3 formation [1] 43/23	former [1] 80/14 forth [3] 11/7 22/7 162/8 fortunate [1] 190/21 forward [4] 13/4 43/24 147/4 158/6 forwarded [2] 202/11 202/11 found [10] 47/21 48/7 48/21 49/13 53/5 71/19 92/7 190/2 209/11 209/16 four [14] 9/20 54/23 60/12 60/23 80/21 81/5 81/5 103/13 104/9 104/10 104/25 105/22 108/20 109/8 fourth [1] 159/5 Fox [1] 3/22 frame [1] 22/10 free [1] 10/8 Freeman [9] 16/8 16/9 16/15 16/20 17/12 17/14 18/3 18/23 140/24 freeze [2] 77/4 186/9 friends [1] 135/5 front [7] 12/19 151/20 152/19 164/22 164/23 164/24 217/8 full [10] 5/5 21/5 46/15 73/22 74/9 79/6 102/8 115/20 164/6 209/19 full-time [1] 46/15 fully [1] 138/24 function [5] 27/22 27/23 28/2 41/3 53/25 functions [1] 36/10 fund [5] 187/22 188/1 188/4 188/9 198/6 funded [7] 42/15 186/16 190/12 190/14 193/4 193/6 193/8 funding [10] 9/7 12/9 24/4 44/25 168/9 168/10 180/15 181/13 188/14 189/12 funds [17] 44/20 87/13 96/13 130/15 180/17 180/19 181/9 181/19 181/20 181/22 182/12 182/23 183/22 194/11 218/15 218/17 218/19 further [7] 38/3 73/21 144/14 218/13 218/21 219/13 219/18 future [3] 17/2 32/12 192/3 fuzzy [1] 89/13
<b>F</b>	<b>G</b>	
faced [1] 189/10 facing [1] 34/9 fact [7] 33/6 36/8 177/6 186/9 188/7 192/7 207/19 factor [3] 11/24 38/10 38/10 factors [3] 38/1 113/21 138/19 fair [5] 104/6 105/20 106/18 107/12 107/15 fairest [1] 179/17 fairly [2] 13/23 175/17 fall [2] 183/4 205/17 falsification [1] 91/12 familiar [17] 9/25 27/9 62/24 63/3 63/23 71/23 139/25 142/1 162/6 163/15 185/1 186/15 205/19 212/20 214/14 214/16 217/9 family [2] 173/2 173/5 far [3] 168/25 176/9 213/18 fast [2] 31/3 185/9 fast-moving [1] 31/3 father [1] 173/10 federal [19] 3/3 10/11 17/15 17/17 19/6 21/5 21/6 59/25 167/12 168/1 168/9 180/19 181/3 181/8 181/9 181/21 182/11 183/22 218/17 feel [7] 10/8 11/13 12/17 31/18 85/8 107/25 206/17 feelings [1] 161/22 felonies [1] 127/12 felony [3] 127/1 127/22 128/1 felt [4] 8/7 8/23 85/6 85/9 females [1] 91/1 Ferrari [1] 218/1	gained [2] 60/18 145/24 game [2] 85/14 218/2 Garcia [2] 92/6 92/11 GARLAND [3] 2/8 219/6 219/24 gathered [1] 152/1 gathering [1] 209/7 gave [8] 32/16 82/10 129/18 129/18 155/22 159/6 181/4 181/12 general [16] 22/19 30/8 30/11 33/3 37/17 72/13 86/7 102/2 106/22 111/10 122/11 122/12 123/9 130/3 187/13 204/8 generally [10] 66/22 67/23 70/19 113/9 113/23 114/7 137/14 141/9 162/6 163/19 generate [1] 196/3 generated [1] 196/4 gentlemen [1] 140/23 Georgia [2] 6/4 6/6 get [44] 13/19 19/3 26/7 32/15 34/11 35/9 42/1 43/13 57/2 61/21 62/5 62/10 67/9 85/15 97/5 116/14 118/4 119/11 127/20 128/18 128/20 134/5 148/11 154/2 169/3 172/12 176/18 179/23 180/16 180/18 181/21 182/1 183/18 188/13 190/21 191/6 201/8 201/15 206/7 206/10 206/10 215/17 217/3	

<p>G</p> <p>get... [1] 218/15</p> <p>gets [2] 144/14 147/21</p> <p>getting [9] 10/25 33/6 33/6 35/7 87/9 110/24 147/11 164/5 213/18</p> <p>give [14] 51/5 58/22 59/4 70/17 73/21 75/7 82/7 82/22 86/8 156/7 156/19 181/15 198/18 206/15</p> <p>given [8] 13/2 13/25 85/24 86/6 86/9 123/23 156/24 181/8</p> <p>gives [1] 63/12</p> <p>giving [2] 58/21 144/7</p> <p>glad [6] 6/4 51/4 85/1 117/11 191/7 213/16</p> <p>go [68] 6/18 9/15 10/5 11/2 11/7 11/17 17/3 23/17 27/5 27/6 38/13 38/21 40/8 44/17 45/5 45/22 45/25 50/14 51/16 53/18 55/23 62/19 62/22 64/20 65/25 66/8 67/23 81/10 81/10 101/13 101/24 109/6 115/16 123/20 125/20 127/16 127/21 135/11 144/9 148/25 149/7 152/13 152/19 153/12 153/24 154/1 156/18 160/14 165/21 173/10 180/22 180/25 183/20 185/3 185/4 187/6 187/21 188/1 190/24 194/9 194/13 198/15 211/4 212/21 213/9 213/11 215/6 216/9</p> <p>go-to [1] 160/14</p> <p>goal [1] 53/15</p> <p>goes [6] 12/7 12/19 68/14 164/13 202/1 205/13</p> <p>going [59] 5/23 9/8 9/14 9/22 11/9 23/24 32/24 33/18 35/9 36/16 39/17 42/22 46/20 46/21 49/8 51/7 51/22 66/8 67/6 67/9 71/9 83/17 83/23 86/4 94/20 99/21 101/13 109/4 121/24 130/15 130/17 130/19 133/22 141/14 142/9 148/11 151/20 154/1 157/2 161/2 168/20 171/1 171/2 172/20 180/13 184/13 184/22 185/6 185/9 189/25 191/2 191/3 192/17 192/17 193/15 193/17 200/6 207/20 209/8</p> <p>gone [2] 93/1 190/20</p> <p>good [17] 5/9 71/18 73/2 84/25 86/11 95/3 95/5 117/25 121/7 135/7 154/12 162/8 173/10 175/17 192/16 199/24 202/25</p> <p>goodness [1] 81/7</p> <p>goods [1] 200/3</p> <p>Google [1] 200/23</p> <p>Googled [1] 201/6</p> <p>got [39] 20/22 24/2 24/4 28/22 35/7 35/12 40/9 42/6 42/21 46/1 47/14 50/1 50/2 51/18 57/16 71/2 83/9 112/17 114/14 117/18 121/5 124/9 125/5 131/23 135/12 141/13 146/6 147/18 168/2 181/2 181/10 183/4 192/22 194/17 196/8 196/25 197/25 200/9 215/19</p> <p>gotten [3] 15/8 37/22 38/4</p> <p>government [33] 1/6 1/12 1/19 6/16 7/25 10/14 10/15 10/20 10/25 12/22 14/3 15/2 15/17 19/4 20/5 21/2 21/6 22/20 26/22 27/3 37/1 37/18 119/19 120/3 139/5 139/23 148/15 180/19 181/3 181/8 182/11 187/14 190/17</p> <p>governmental [6] 10/12 14/9 16/21 16/21 18/1 22/13</p> <p>governor's [1] 21/5</p> <p>GPA [1] 124/24</p>	<p>grade [2] 125/10 159/5</p> <p>grades [2] 91/12 125/16</p> <p>graduate [2] 6/5 6/7</p> <p>graduated [1] 173/4</p> <p>graduation [2] 159/6 173/6</p> <p>great [10] 5/11 5/11 5/11 19/12 54/20 96/9 96/11 96/14 139/14 161/22</p> <p>gross [1] 23/24</p> <p>Group [4] 135/18 136/13 137/6 137/18</p> <p>Groups [1] 136/19</p> <p>guess [13] 8/8 8/20 27/12 47/1 94/16 127/5 128/5 156/10 160/25 183/3 185/20 186/7 205/17</p> <p>guessing [1] 205/16</p> <p>guilty [1] 132/1</p> <p>gun [1] 126/22</p> <p>H</p> <p>had [165] 7/22 7/23 8/7 8/18 8/24 11/4 14/25 17/9 18/8 20/4 23/2 23/6 28/19 32/5 34/8 34/10 34/12 34/21 35/2 35/19 36/4 37/21 37/21 38/7 40/12 42/13 42/19 44/14 48/6 48/12 49/15 49/21 52/2 52/5 52/16 53/3 53/5 54/23 56/9 56/11 56/14 56/15 56/15 56/16 59/23 66/10 66/12 67/13 67/15 76/20 77/2 77/3 77/20 77/22 78/16 87/1 88/6 88/22 90/7 90/19 90/25 91/6 91/11 91/14 93/3 93/6 94/8 96/8 99/3 100/17 104/11 108/21 108/22 109/9 110/18 113/9 116/24 117/2 117/9 117/23 118/5 118/24 119/1 123/4 129/21 130/6 130/8 130/8 130/10 133/17 133/18 133/18 135/2 136/24 138/21 145/24 146/5 146/5 152/16 154/24 156/9 156/24 162/4 162/10 162/19 170/14 170/20 170/24 173/1 173/4 173/5 173/9 176/15 176/22 177/2 177/5 179/4 179/19 179/21 181/16 181/17 182/3 183/8 187/3 187/18 187/24 188/15 189/2 189/10 190/3 190/7 190/8 190/20 190/22 191/8 192/22 194/9 199/25 200/3 203/17 203/19 203/25 204/3 204/5 204/10 204/11 204/12 204/14 204/16 204/17 204/22 207/5 207/23 209/8 209/10 209/16 209/21 210/4 210/10 210/11 210/14 210/15 210/23 212/21 214/15</p> <p>hadn't [2] 36/4 133/18</p> <p>half [2] 52/1 72/23</p> <p>hand [3] 112/5 168/25 201/2</p> <p>handgun [1] 126/22</p> <p>handle [2] 10/14 11/12</p> <p>handled [2] 10/11 14/6</p> <p>handles [2] 78/9 78/11</p> <p>hang [10] 26/8 51/12 81/10 83/8 112/7 121/3 131/17 134/4 148/24 196/9</p> <p>Hank [3] 153/25 201/6 201/6</p> <p>Hansen's [1] 48/2</p> <p>happen [3] 155/19 158/20 193/17</p> <p>happened [7] 11/11 42/9 88/4 195/19 197/21 208/14 210/14</p> <p>happening [2] 80/23 179/15</p> <p>happens [6] 122/15 122/22 122/25 137/12 159/7 196/16</p> <p>happy [1] 10/3</p> <p>Harbison [6] 3/17 3/18 4/2 9/21 200/15 200/16</p> <p>hard [1] 112/6</p> <p>Harris [1] 21/20</p>	<p>has [43] 14/17 14/23 19/10 25/24 41/23 44/11 48/25 65/15 68/19 69/16 71/2 78/5 81/1 87/2 96/18 96/19 96/23 99/20 106/24 107/16 117/12 117/16 117/17 120/22 123/14 124/10 124/15 124/21 144/12 144/12 144/17 144/21 152/11 163/14 165/15 171/22 178/5 178/15 180/13 193/12 197/24 204/12 211/1</p> <p>have [389]</p> <p>haven't [4] 15/7 16/22 69/18 212/17</p> <p>having [8] 5/2 35/25 36/1 39/17 60/21 60/22 85/3 85/4</p> <p>he [175] 5/11 14/11 14/12 14/13 14/14 14/19 14/22 14/23 14/25 16/10 16/12 17/14 17/19 17/20 17/23 18/4 18/8 18/14 18/24 19/1 19/21 31/13 32/19 52/16 52/17 63/12 87/4 87/6 87/9 87/12 89/4 89/18 89/20 90/6 95/2 95/3 95/7 95/12 95/13 96/8 96/8 96/19 97/2 97/3 97/3 97/17 97/20 98/6 98/7 98/10 116/14 117/23 117/25 118/5 118/8 118/12 118/15 118/17 118/20 118/20 119/1 119/2 119/9 120/10 123/21 124/3 125/5 125/23 125/25 126/15 127/3 127/5 127/8 127/23 128/1 128/2 128/3 128/5 129/21 130/6 130/8 130/10 131/22 132/1 132/9 132/12 132/19 132/25 133/4 133/14 135/14 135/17 135/17 135/20 135/23 135/23 136/3 136/5 136/12 136/14 136/18 137/16 138/3 138/3 138/5 138/6 138/8 138/8 138/20 138/24 139/4 139/6 139/6 139/8 139/8 139/12 142/2 142/16 143/5 143/20 143/23 143/25 144/4 144/12 144/16 144/19 144/20 144/21 145/3 145/4 145/24 146/9 147/8 147/25 148/14 149/20 155/13 170/20 172/2 172/17 172/18 173/4 173/5 173/9 173/9 173/13 176/15 176/17 176/18 186/8 202/21 203/9 203/11 203/16 203/21 203/25 204/3 204/5 204/5 204/6 204/10 204/12 204/16 204/21 204/22 205/3 206/1 206/12 206/20 207/5 207/11 207/12 207/15 207/23 208/3</p> <p>he'd [1] 146/11</p> <p>he's [9] 17/13 87/15 124/4 124/9 128/3 135/12 135/14 135/25 206/2</p> <p>head [5] 6/16 40/24 86/2 86/11 196/13</p> <p>heading [1] 215/15</p> <p>headings [1] 27/6</p> <p>headline [1] 191/15</p> <p>heads [1] 31/10</p> <p>health [2] 172/22 173/1</p> <p>hear [8] 81/9 91/22 92/2 93/21 94/19 97/7 120/24 171/13</p> <p>heard [9] 94/12 94/13 94/21 94/22 95/3 97/6 127/18 158/22 171/14</p> <p>hearing [6] 3/5 12/4 23/2 23/3 67/18 68/9</p> <p>hearings [1] 23/17</p> <p>hearts [1] 170/21</p> <p>held [4] 5/15 26/9 117/5 202/8</p> <p>help [14] 6/12 8/7 13/4 53/17 57/11 61/5 110/19 111/2 167/6 170/13 198/6 204/6 204/13 207/10</p> <p>helped [1] 60/14</p> <p>helping [5] 47/2 190/24 203/20 204/2 217/14</p>
--	--	---



H	hiring [10] 8/24 20/21 21/1 112/6 116/5 121/18 128/15 137/16 138/23 147/1 his [78] 12/7 14/15 14/17 16/24 18/11 18/14 18/18 22/17 22/18 37/19 63/12 63/14 72/1 72/3 87/6 87/9 87/12 87/20 90/23 92/24 93/1 95/1 97/16 110/22 118/18 119/15 123/4 123/10 123/20 124/4 124/12 124/24 125/21 130/13 131/23 132/19 133/14 135/8 135/12 136/25 137/2 137/8 138/5 138/13 140/19 143/2 143/11 143/13 143/15 143/18 144/2 144/4 144/7 144/14 144/19 145/4 148/14 153/16 153/17 164/9 171/9 171/10 173/1 173/2 173/3 173/5 173/6 173/7 173/7 173/10 175/15 176/1 176/10 199/1 204/2 205/23 206/8 207/6 historic [1] 189/13 history [6] 21/9 26/20 145/9 145/11 145/15 197/6 hitting [1] 43/18 hold [2] 12/4 14/19 Holmes [1] 1/7 home [3] 173/10 195/6 212/25 Honduras [1] 190/23 honest [1] 162/13 honesty [1] 162/15 hooked [1] 165/23 hope [3] 90/14 113/24 212/2 hoped [2] 8/6 90/18 hospitalized [2] 172/17 172/18 hour [1] 72/23 hours [1] 136/12 house [4] 75/17 212/22 213/4 213/20 houses [2] 195/22 196/25 how [57] 8/2 9/3 10/23 10/25 11/9 14/17 18/2 18/10 24/24 32/15 33/3 33/20 33/25 41/11 42/7 42/16 44/10 49/12 54/2 56/9 65/19 81/17 93/8 93/22 94/16 96/20 100/18 109/14 114/6 115/21 124/22 124/22 127/19 128/4 128/12 136/12 147/8 147/9 155/16 157/11 159/15 171/23 176/18 181/9 185/11 185/17 197/25 199/18 201/13 202/19 203/22 204/9 206/21 207/3 208/1 211/18 211/25 however [1] 84/13 HR [4] 89/12 89/17 146/16 160/3 hub [1] 178/19 Hughes [45] 4/12 4/14 4/15 112/17 115/25 116/14 117/19 117/23 119/12 119/15 119/19 120/6 120/8 121/5 121/14 123/3 123/17 130/1 131/10 131/23 134/17 135/3 135/9 137/16 138/16 138/20 140/24 141/23 145/22 146/2 146/23 148/10 148/14 150/24 151/21 152/17 153/10 154/1 154/5 157/23 159/2 167/10 167/11 176/1 177/4 Hughes' [1] 149/2 Hughes's [1] 120/2 huh [27] 9/13 9/15 55/25 77/15 84/6 92/19 94/18 98/25 104/19 104/24 105/1 109/25 118/3 130/20 135/13 137/1 159/22 163/2 163/10 163/19 165/19 172/19 203/10 207/18 210/6 213/5 216/24 human [14] 27/20 28/3 28/8 28/9 28/10 54/4 59/18 65/5 72/1 88/21 153/19 165/2 165/5 173/13	hundred [2] 185/16 187/2 hurdle [4] 34/10 34/21 34/22 35/1 husband [1] 173/10 hypothetical [6] 53/9 74/20 99/23 108/5 122/17 122/19
helps [2] 43/25 185/7 HENRY [6] 1/24 3/1 5/1 5/7 5/10 201/4 Henson [21] 24/19 24/22 31/4 31/9 32/1 32/23 33/17 45/14 48/11 52/21 63/6 63/17 148/4 148/18 160/2 160/13 164/25 184/19 187/7 193/25 200/5 Henson's [1] 46/19 her [116] 7/21 7/22 7/22 8/4 8/4 8/22 12/7 16/23 17/6 17/8 17/9 17/10 20/3 36/16 40/17 41/5 42/5 42/5 42/6 54/1 54/3 54/6 54/8 59/2 60/14 61/17 66/9 66/21 67/1 67/6 74/10 90/11 90/23 91/8 91/22 93/10 94/3 94/20 94/23 96/8 99/10 99/18 103/3 103/7 103/11 103/23 104/11 107/13 107/13 107/16 109/10 110/22 116/17 116/17 116/18 116/18 117/2 120/15 139/14 146/13 146/22 150/12 150/21 150/23 151/10 151/11 152/3 152/23 152/23 154/20 154/21 154/23 154/25 155/4 155/7 155/22 157/6 158/14 159/5 161/7 161/21 161/23 161/24 161/24 162/6 162/11 162/12 162/14 162/18 162/19 170/7 174/15 174/22 176/18 176/24 176/25 177/1 177/18 178/9 178/10 189/19 189/23 189/24 198/19 198/23 199/4 199/12 204/12 204/13 207/19 207/23 207/25 207/25 208/25 209/18 209/18 here [45] 20/2 20/11 20/13 21/21 22/3 28/22 45/23 45/25 46/1 47/4 47/8 47/15 47/18 48/2 49/25 50/1 50/17 57/17 64/4 83/8 84/3 99/21 111/11 125/20 127/17 129/8 132/8 133/1 135/12 140/20 141/14 143/17 143/20 144/12 144/16 148/25 166/9 169/4 169/11 185/5 186/7 194/18 195/10 196/8 196/25 hereby [1] 219/7 hers [1] 162/7 hey [1] 32/24 high [24] 14/16 20/7 20/9 20/10 82/14 85/4 97/4 125/1 131/1 169/2 170/8 171/4 171/6 172/2 173/4 202/19 205/2 205/11 205/22 206/6 206/12 208/8 209/24 210/2 high-ranking [1] 20/10 higher [6] 85/6 177/7 192/5 192/6 195/20 197/1 highest [1] 177/10 him [65] 14/23 16/10 17/3 17/10 18/3 18/5 19/2 32/9 89/11 89/22 92/20 92/21 92/22 95/5 117/24 119/11 119/17 119/19 119/24 120/16 120/17 120/18 120/19 121/24 125/21 126/4 126/19 128/7 128/10 130/3 130/6 132/6 132/7 135/5 139/16 146/3 146/4 146/9 146/10 146/11 148/5 148/6 148/10 148/16 153/11 155/23 159/3 170/10 170/10 170/13 170/16 175/15 176/3 176/10 200/6 201/10 201/17 202/20 202/25 204/21 207/7 207/15 207/20 209/14 210/4 himself [1] 218/1 hire [11] 19/18 61/4 120/21 151/11 154/5 154/6 154/8 176/3 178/4 192/3 192/8 hired [7] 57/2 110/6 111/17 128/9 151/10 174/25 200/8	I I'd [1] 51/4 I'll [9] 9/17 10/3 85/1 117/11 131/16 158/5 191/7 206/10 213/16 I'm [162] 5/23 5/24 7/10 8/20 9/10 9/14 9/22 9/24 16/18 17/7 18/20 19/11 19/13 19/16 20/20 21/1 21/12 22/4 23/21 24/11 27/9 28/1 30/16 30/18 31/22 31/25 33/12 39/6 42/3 45/23 46/6 49/4 49/20 51/1 51/7 57/6 57/20 59/3 60/1 60/7 63/15 63/23 68/12 68/22 69/2 70/16 70/22 81/9 82/11 86/10 88/10 88/15 88/15 88/20 89/12 89/12 89/13 90/10 91/5 91/24 92/12 94/5 95/8 95/12 95/14 99/18 100/10 100/12 100/16 101/7 101/8 101/18 101/19 102/2 102/8 103/4 103/25 104/2 105/6 105/7 106/22 107/2 107/2 110/9 114/11 115/13 115/16 115/19 116/10 118/4 119/7 122/6 122/19 123/24 124/17 126/9 127/5 129/12 129/19 130/7 130/23 132/4 132/17 137/19 138/24 139/22 145/19 148/23 148/24 150/17 150/20 155/16 161/17 162/3 162/6 163/19 163/20 165/2 165/25 167/22 168/19 168/20 171/25 172/10 172/21 173/14 173/18 174/3 174/16 175/24 175/24 177/21 178/17 184/2 184/13 184/20 184/22 185/10 186/1 189/25 195/6 195/10 195/20 195/25 197/5 199/15 199/17 204/10 204/24 206/5 206/9 206/10 207/11 207/21 209/19 210/12 210/20 212/18 216/2 217/6 218/3 218/4 I've [13] 6/21 9/23 38/14 69/20 83/18 94/13 94/21 95/3 99/23 141/13 143/18 175/24 178/9 idea [12] 41/11 44/12 48/23 92/24 96/12 96/15 170/24 191/6 191/20 198/18 206/21 210/4 identified [1] 11/10 identifies [1] 32/19 identify [2] 127/2 127/3 illegal [1] 102/7 imagine [3] 69/5 89/14 198/14 immediately [3] 81/20 118/7 118/22 impact [2] 80/23 122/14 implementation [1] 25/8 implemented [2] 76/17 77/5 implementing [2] 75/19 75/23 implied [2] 132/13 132/13 importance [1] 190/6 important [8] 23/3 36/8 36/11 81/13 81/25 109/20 122/4 176/14 improper [1] 127/19 improve [1] 85/7 improvement [1] 59/23 inaccurate [1] 10/8 inadequate [1] 44/25 include [4] 10/13 21/9 84/13 140/17 included [6] 84/20 140/16 141/10 141/10 161/5 165/3 includes [2] 127/18 147/10 including [2] 38/1 218/10	

I	J
inclusion [20] 112/19 114/6 116/23 116/25 118/7 118/10 124/23 136/8 139/5 139/7 139/16 142/18 143/6 143/22 148/8 160/22 165/11 167/10 170/4 170/5	JAMES [2] 1/16 3/9
inclusive [1] 140/13	JANE [55] 1/3 3/10 36/16 36/20 38/17 39/23 40/12 41/4 42/4 42/15 53/3 53/7 93/3 93/6 93/9 93/13 93/17 93/19 94/2 94/6 99/21 112/15 112/23 112/23 112/24 115/25 116/15 117/12 120/21 133/16 146/13 149/25 150/3 151/6 151/9 151/12 151/21 151/23 151/24 152/9 152/22 153/2 154/6 154/19 155/21 158/11 158/18 160/24 161/22 170/2 176/3 176/17 177/4 177/24 199/3
inconsistency [1] 86/5	JANIE [3] 2/8 219/6 219/24
incorrect [1] 193/20	January [4] 83/15 83/15 132/24 133/3
incorrectly [1] 85/25	January 13th [1] 133/3
increase [5] 156/3 168/6 189/2 189/13 197/19	January 15th [1] 132/24
increased [6] 13/3 41/9 190/24 197/16 197/17 198/5	January 2020 [1] 83/15
increasing [1] 189/15	January 20th [1] 83/15
independently [1] 204/5	jesse [5] 3/17 3/18 3/20 9/21 200/16
index [2] 4/1 64/14	jesseharbisonlaw.com [1] 3/20
indicates [1] 186/11	Jessie [1] 161/7
individual [13] 16/3 16/4 29/1 31/21 66/1 66/5 66/5 66/8 66/11 66/12 67/17 79/5 198/14	JoAnn [2] 19/24 20/1
individualized [1] 81/12	job [108] 8/3 8/12 8/16 8/19 9/25 14/2 14/7 14/8 14/8 15/2 16/15 16/21 16/25 17/2 17/13 18/3 18/8 18/11 18/18 18/25 19/1 19/10 19/11 19/14 30/4 36/21 37/23 42/5 42/15 53/3 53/7 53/13 59/8 81/17 87/6 87/9 87/12 87/25 91/23 92/3 98/11 106/10 110/22 111/5 112/16 113/8 113/11 113/12 113/23 114/10 115/4 115/7 116/15 116/19 116/21 116/22 117/4 117/6 117/25 119/5 122/14 128/18 137/2 146/2 146/10 148/11 149/22 150/8 151/10 154/2 160/17 164/9 168/2 170/3 173/15 174/15 176/8 176/15 176/23 176/24 177/8 177/9 177/10 177/10 177/16 177/20 177/22 178/3 178/22 178/22 179/4 190/16 192/23 192/25 193/11 193/19 198/20 198/23 199/1 199/4 199/9 202/20 203/16 204/12 210/22 211/2 211/3 211/14
individually [4] 66/19 67/1 98/23 99/2	jobs [42] 29/13 29/23 30/1 32/3 32/25 33/18 33/19 34/1 34/16 37/24 38/4 38/8 45/16 46/4 46/13 46/20 48/13 49/9 59/9 59/11 60/4 81/23 105/17 106/8 108/11 114/14 137/14 159/10 159/11 177/2 177/17 177/25 178/12 178/19 179/1 179/12 186/17 188/10 190/3 192/17 200/7 204/13
individuals [4] 15/25 104/8 105/9 105/10	joined [1] 69/21
inefficiencies [1] 50/15	Jonathan [1] 150/19
inextricably [1] 145/11	judge [3] 1/6 1/6 20/13
inflationary [2] 33/7 189/9	judgment [1] 137/8
influence [2] 21/3 81/6	July [3] 6/20 7/21 193/19
influx [1] 190/23	jumping [1] 26/20
inform [2] 32/12 44/1	June [5] 39/5 135/15 135/21 136/4 138/17
information [56] 12/4 12/7 29/8 31/20 32/6 32/12 34/7 36/24 43/12 43/25 44/12 49/15 58/21 59/1 59/3 64/3 65/3 70/21 72/9 72/12 73/14 73/18 73/22 73/23 73/25 74/1 74/7 78/1 80/11 80/14 80/17 81/4 82/7 82/11 85/16 85/21 85/24 86/6 86/9 92/11 92/22 93/1 99/7 100/24 100/25 114/10 115/1 115/9 129/7 151/25 185/25 190/8 199/17 210/14 211/22 216/3	June 2020 [1] 135/15
ing [1] 75/6	Jury [1] 1/5
initial [1] 210/10	just [103] 20/20 21/13 22/5 27/7 30/9 31/24 33/20 37/10 44/10 44/14 48/22 48/24 49/14 51/3 51/8 51/21 57/21 61/15 62/23 64/11 65/2 81/24 82/2 82/10 84/17 84/23 85/13 86/7 88/25 90/15 91/5 92/12 95/4 97/5 98/17 105/7 105/13 105/24 106/1 106/2 106/22 107/5 107/7 109/1 109/13 109/22 111/3 111/19 116/20 119/3
initially [1] 56/20	
input [11] 44/12 89/21 90/1 90/7 90/15 90/19 90/20 90/23 173/21 179/10 179/14	
inputs [1] 211/21	
insight [2] 58/23 211/11	
Instagram [2] 218/1 218/4	
instance [2] 11/4 27/20	
instead [6] 33/1 33/9 33/19 60/21 60/22 105/9	
instruction [1] 79/21	
instructional [1] 110/17	
integrating [1] 75/17	
interact [2] 202/22 202/25	
interest [8] 106/10 131/1 203/20 203/25 204/17 204/22 205/24 206/4	
interested [10] 16/11 16/25 17/13 45/23 205/11 206/13 207/23 208/3 209/13 219/15	
interesting [1] 204/20	
interim [7] 55/8 58/4 78/16 78/18 79/24 83/1 84/10	
international [1] 6/7	
intertwined [1] 145/15	
interview [52] 8/9 19/14 98/11 111/20 113/14 113/18 113/20 113/22 113/24 114/1 114/3 115/22 116/1 116/17	
	116/18 117/3 118/17 118/21 119/2 120/1 120/4 133/2 133/8 133/10 151/10 151/13 151/15 152/1 152/3 152/22 153/2 153/5 153/14 153/17 153/22 157/22 158/11 158/15 161/21 161/24 170/7 170/11 171/10 171/12 172/3 174/12 174/19 175/2 175/11 208/18 209/8 209/14
	interviewed [22] 7/11 15/7 56/16 98/8 111/13 111/16 111/21 113/5 113/7 115/21 117/22 117/24 128/7 132/5 132/7 150/3 150/5 151/20 153/10 159/3 165/10 210/22
	interviewers [1] 172/1
	interviewing [7] 15/4 19/2 114/4 122/2 122/6 122/20 175/23
	interviews [19] 114/6 116/9 153/8 157/3 157/8 157/9 157/21 165/10 170/25 172/6 172/15 172/20 175/9 175/20 175/20 209/7 210/10 210/15 210/19
	invest [1] 198/13
	investigated [2] 41/24 42/2
	investigation [1] 171/22
	investment [1] 13/3
	investments [3] 11/15 13/2 167/14
	invite [2] 66/21 96/2
	invited [1] 146/22
	invites [1] 95/23
	inviting [2] 148/16 148/19
	involve [1] 10/16
	involved [15] 31/5 31/5 31/6 50/24 88/17 88/21 89/15 91/24 113/17 161/16 171/11 205/1 211/22 211/24 214/23
	irrelevant [3] 109/22 109/23 130/4
	irresponsible [1] 192/6
	is [311]
	isn't [5] 33/20 36/9 42/16 153/24 153/25
	isolated [1] 41/3
	isolation [1] 68/16
	issue [6] 53/21 74/19 136/11 215/9 215/22 217/13
	issues [9] 6/12 36/1 118/10 123/14 130/9 161/5 161/18 172/22 173/1
	it [425]
	It just [1] 207/3
	it's [103] 5/7 5/18 9/18 10/23 11/10 12/15 13/8 13/23 15/9 17/25 18/21 23/23 24/2 24/3 24/7 25/14 27/11 27/13 28/14 31/3 31/24 40/8 43/7 45/2 45/3 48/19 48/23 49/12 50/17 53/9 63/19 64/6 68/13 70/20 72/22 73/2 73/13 74/14 79/3 80/3 80/5 80/19 81/3 81/13 81/25 83/15 83/23 85/13 86/12 89/17 95/16 97/24 101/20 104/17 105/20 105/21 106/18 107/9 109/1 109/20 109/23 121/6 121/8 125/21 127/6 127/10 127/10 127/15 129/13 131/23 138/1 138/3 143/1 143/4 147/17 149/2 151/17 152/12 152/15 159/6 166/12 168/22 168/23 169/12 183/12 183/15 184/5 184/8 184/11 185/7 186/11 188/3 188/19 188/22 195/8 201/23 204/19 206/3 206/25 207/3 208/14 208/16 216/25
	items [4] 49/18 50/6 68/14 100/21
	its [1] 83/9
	itself [1] 108/18



J	LEFFLER [8] 1/9 3/9 91/16 91/18 92/5 111/12 189/21 198/19 Leffler's [1] 92/3 left [5] 14/22 138/21 144/19 168/25 176/24 left-hand [1] 168/25 legal [9] 3/2 9/10 65/6 69/8 101/11 101/17 101/19 116/8 165/4 legally [2] 100/2 100/2 legislature [1] 21/4 less [12] 33/7 125/12 125/13 125/14 125/16 125/18 139/9 187/24 194/24 195/12 195/12 217/22 lesser [1] 190/6 lesson [3] 93/7 93/22 94/3 let [42] 27/6 29/22 32/9 38/13 38/21 47/14 48/1 62/2 62/9 65/20 79/13 95/12 96/21 98/17 98/24 101/23 101/24 103/21 112/5 120/15 125/5 127/13 129/12 134/5 134/19 135/8 146/11 147/7 152/5 157/17 157/19 165/23 165/25 175/15 186/1 195/9 203/1 204/24 206/15 207/23 207/25 208/3 let's [29] 26/7 27/5 43/13 45/22 46/12 51/16 52/8 53/24 55/23 62/22 85/9 89/25 107/7 123/20 125/20 127/21 131/9 135/11 145/4 148/25 149/7 169/22 185/4 192/21 196/8 196/8 196/9 196/14 216/11 letters [1] 37/1 level [7] 81/12 82/14 85/4 113/10 125/2 195/21 210/14 levels [1] 61/18 lever [1] 53/17 levy [2] 213/13 213/14 liability [1] 137/22 liaison [1] 22/18 license [11] 125/21 127/19 132/20 173/13 173/14 173/17 173/24 174/3 174/6 178/5 178/16 licensed [3] 219/6 219/18 219/19 life [1] 215/14 life-changing [1] 215/14 light [1] 186/25 like [82] 8/7 8/24 11/14 12/11 13/22 16/24 18/21 21/16 23/22 23/23 27/1 31/18 33/23 60/24 62/15 62/23 83/14 85/9 85/13 86/1 98/3 100/1 100/10 100/13 105/8 106/15 107/25 112/8 114/10 114/17 117/9 120/3 120/8 120/9 121/6 121/20 121/23 122/17 125/9 131/3 131/5 132/9 133/17 134/23 135/9 138/3 139/17 144/16 146/9 146/10 146/22 149/1 149/10 149/23 152/5 152/23 154/20 157/3 158/25 159/6 160/12 163/5 163/6 163/17 166/21 167/6 177/14 183/1 188/19 188/20 189/8 196/10 196/15 198/6 200/25 204/17 204/19 206/21 208/2 209/18 209/19 212/4 LILY [9] 1/9 3/9 91/15 91/18 92/2 92/5 111/12 189/21 198/19 limit [1] 92/9 limited [2] 116/20 137/22 limiting [1] 11/24 Linden [1] 213/2 line [4] 60/18 61/1 76/6 85/10 lined [1] 118/4 lines [2] 101/5 101/7	linked [1] 145/11 LinkedIn [22] 4/14 4/17 5/24 5/25 134/6 134/7 134/13 134/16 134/24 135/3 135/5 135/7 135/8 140/19 143/8 143/13 143/15 143/17 200/19 200/20 201/7 202/13 Lisa [5] 72/2 129/4 149/24 150/10 165/5 list [2] 31/2 127/24 listed [7] 47/15 47/18 50/1 128/3 131/22 135/12 137/2 listening [1] 116/10 lists [1] 144/4 literacy [1] 77/2 literally [3] 12/15 130/24 155/23 little [16] 6/3 8/11 12/10 22/5 39/19 44/3 68/10 89/13 110/24 135/11 138/17 139/9 166/8 166/12 183/18 209/1 live [3] 173/3 194/18 195/4 lives [3] 17/14 206/20 206/24 LLC [6] 3/12 135/18 136/19 137/6 137/18 137/22 loan [3] 130/17 130/19 130/22 loans [2] 130/9 130/25 local [5] 19/7 95/25 96/1 167/13 168/2 long [5] 14/17 42/25 56/9 114/6 176/23 long-time [1] 176/23 longer [2] 57/1 172/24 look [24] 11/17 26/5 27/1 31/23 35/15 47/17 86/16 86/21 117/8 117/11 135/2 135/9 137/25 152/13 152/22 156/23 161/4 183/20 196/12 196/18 213/11 213/16 215/6 218/3 looked [6] 59/13 59/17 86/17 137/5 157/12 190/3 looking [20] 5/20 13/23 15/1 15/10 15/16 19/9 19/11 21/13 22/10 109/12 123/22 160/10 166/13 176/8 186/5 191/6 201/21 203/14 203/18 211/24 looks [17] 62/15 62/23 63/23 71/23 83/14 121/20 121/23 132/9 138/3 142/1 144/16 149/1 149/10 152/5 185/10 196/10 196/14 lose [1] 106/8 losing [2] 137/14 139/1 lost [5] 42/5 87/6 87/9 87/12 164/9 lot [14] 8/5 19/3 61/21 64/19 68/14 92/21 125/16 161/5 177/5 179/22 182/16 190/21 191/24 202/24 lots [2] 203/5 207/24 low [1] 191/23 lower [3] 192/5 196/19 196/20 loyal [1] 91/16 lunch [2] 148/22 154/16
K		
Karl [1] 160/25 keep [8] 61/21 110/21 116/3 116/3 128/18 165/13 175/8 185/6 keeping [1] 175/19 kept [7] 42/8 116/6 116/11 175/11 175/14 190/3 215/20 Kevin [7] 37/18 37/19 155/5 155/8 155/9 155/11 155/22 kids [1] 79/6 kin [1] 92/6 kind [14] 11/16 70/9 80/17 110/17 115/18 133/12 147/2 164/13 177/20 189/5 194/11 204/15 204/16 206/3 Knapp [4] 155/5 155/8 155/11 155/22 knew [7] 18/5 88/10 123/17 142/23 147/24 148/14 203/8 know [360] knowing [3] 34/2 137/20 200/10 knowledge [29] 21/7 29/7 30/20 32/22 33/17 34/12 43/11 43/16 44/6 50/3 72/6 72/13 72/14 86/7 89/24 102/2 116/21 130/3 140/8 143/1 163/22 163/23 164/7 209/19 211/7 211/25 212/1 212/2 219/11 known [3] 33/9 133/6 142/25		
L		
labor [5] 139/25 140/1 140/7 140/9 140/12 lack [3] 85/16 85/17 86/5 Lamar [3] 140/20 140/21 140/24 language [1] 75/20 large [1] 110/16 last [5] 18/14 22/12 35/2 37/19 196/7 late [2] 156/23 182/12 later [6] 10/6 86/11 114/21 115/15 182/25 209/1 law [15] 3/2 3/12 3/18 3/18 3/23 98/21 99/5 100/14 100/15 101/9 102/7 103/2 107/19 132/13 197/11 laws [2] 102/5 124/21 lawsuit [5] 9/21 91/6 94/6 120/22 180/14 lawsuits [1] 130/6 lawyers [1] 27/11 lay [1] 178/13 layer [4] 60/21 77/23 81/2 82/5 layers [1] 80/25 LCR [3] 219/6 219/20 219/24 lead [3] 1/7 207/10 210/13 leadership [2] 160/20 164/14 leading [5] 31/20 32/6 43/22 45/10 49/15 leads [2] 31/19 32/18 learning [4] 76/20 205/20 206/4 206/13 least [3] 136/4 159/3 209/24		
	M	
	M-A-R-C [1] 150/19 ma'am [25] 39/1 46/2 121/17 165/8 167/15 169/11 169/18 173/18 173/23 174/24 175/13 181/5 181/11 181/14 184/4 185/24 186/18 188/11 188/23 189/1 191/13 192/24 197/9 208/5 212/8 machine [1] 126/22 made [27] 11/19 33/13 34/8 43/18 44/7 45/1 45/12 47/1 60/25 64/18 64/19 65/14 87/19 93/3 93/6 107/16 113/9 117/24 157/7 159/1 165/16 165/22 177/21 187/12 190/7 207/6 207/8	

M	212/6	mentally [1] 148/23
Magistrate [1] 1/6	mayor [19] 12/7 12/25 22/17 22/17	mention [2] 207/14 210/1
mail [4] 13/5 13/7 202/4 202/5	23/1 95/4 96/6 137/10 137/10 137/11	mentioned [18] 33/5 50/19 52/11 71/12
mailing [2] 176/24 177/1	138/20 138/25 138/25 139/1 139/13	72/20 83/21 131/13 133/25 138/8
mails [2] 36/25 37/6	139/24 142/17 161/4 198/12	139/17 141/6 142/12 148/16 169/24
main [4] 112/9 116/22 176/9 179/13	mayor's [10] 13/10 21/3 22/8 22/15	200/18 202/15 204/16 207/13
mainly [1] 162/2	118/5 118/20 137/9 137/9 140/11	mentions [1] 159/5
maintain [1] 189/12	176/2	merged [1] 192/23
Major [1] 137/11	mayoral [6] 118/24 137/13 139/18	merits [1] 133/10
majority [4] 23/14 37/16 37/16 197/15	143/1 143/3 188/15	MERIWETHER [12] 1/16 3/10 87/18
make [59] 12/13 19/18 29/4 29/11	me [122] 6/2 7/11 7/11 8/14 8/25 9/24	88/13 88/17 88/24 102/13 103/10
29/21 30/16 30/22 31/11 31/15 34/14	10/23 11/2 12/11 23/21 27/6 28/10	103/22 189/17 198/23 199/10
42/20 43/14 51/25 52/2 52/5 52/8	29/22 37/23 38/13 38/21 43/5 44/16	Meriwether's [1] 87/25
54/18 55/22 60/11 67/13 70/10 70/21	44/21 45/19 47/2 47/14 48/1 50/22	messages [1] 36/25
81/8 82/14 83/6 89/13 91/5 93/8 93/22	52/2 59/6 60/3 62/2 62/9 65/3 65/20	messed [1] 155/3
94/19 100/24 101/4 101/9 106/2 107/6	70/10 74/10 75/6 75/7 78/25 79/7	messy [1] 147/21
109/2 110/13 112/2 125/17 128/18	79/13 80/19 88/12 90/12 95/12 96/21	met [3] 7/22 66/18 99/1
129/24 129/25 138/11 146/16 146/17	98/17 98/24 101/10 101/23 101/24	method [1] 199/24
148/3 157/13 158/15 170/13 179/23	103/21 105/18 107/6 110/6 111/23	metro [77] 3/2 6/15 6/24 10/17 10/19
189/10 192/6 192/16 194/13 195/10	112/5 112/9 112/25 117/1 117/23	10/23 10/25 11/8 12/2 12/21 12/21
202/6 202/12 204/24 205/7	121/22 125/5 127/13 127/16 129/12	12/25 13/1 13/9 14/13 16/12 20/4 21/3
maker [1] 111/25	129/18 129/18 134/5 134/19 135/8	22/7 22/7 23/5 23/18 35/2 37/1 40/18
makes [6] 7/18 9/16 18/24 20/22	138/12 138/15 143/15 144/6 146/21	41/24 43/6 44/18 50/4 56/11 56/14
139/18 160/12	150/2 151/11 152/6 152/19 153/23	61/19 65/6 79/3 87/4 87/6 87/16 95/9
making [13] 32/13 35/16 45/18 91/2	156/7 156/19 156/19 156/24 157/6	95/18 96/18 96/24 97/23 103/1 119/18
140/14 140/16 140/18 148/12 173/9	157/17 157/19 158/5 158/19 159/6	119/19 120/2 120/22 120/25 125/2
175/20 177/19 191/24 195/16	163/2 164/4 165/23 165/25 166/17	135/14 136/5 136/9 137/5 138/6 139/5
males [1] 91/2	170/7 170/23 180/5 184/19 185/4	139/23 148/15 153/1 160/15 163/16
manager [5] 32/2 42/19 42/23 43/2	186/1 189/7 194/25 195/10 199/11	164/12 165/3 171/22 172/24 180/23
112/7	200/25 200/25 201/2 202/5 202/12	181/3 181/7 181/25 187/13 190/1
managers [3] 29/10 39/16 39/20	203/1 204/24 206/5 206/15 206/15	190/17 194/10 194/17 198/12 212/21
many [18] 9/3 33/4 33/10 33/13 34/8	206/21 207/8 207/23 207/24 209/4	214/15 218/6
80/24 81/13 113/21 115/22 135/7	210/13 211/10 212/17 219/8	Metro's [1] 202/11
136/12 162/7 176/23 185/11 185/17	me the [1] 129/18	METROPOLITAN [5] 1/6 1/12 1/19
203/3 203/12 212/11	mean [46] 7/5 11/3 11/22 20/20 44/11	3/23 26/12
Marc [1] 150/19	49/24 57/15 60/20 73/4 75/21 75/22	MG [13] 4/9 4/10 62/20 64/1 71/21
March [3] 1/24 3/2 168/23	82/10 83/1 89/23 92/8 94/14 113/7	83/9 83/12 121/16 142/5 142/8 149/5
March 2021 [1] 168/23	118/16 118/22 120/9 124/18 127/6	149/15 168/17
margin [2] 193/23 193/24	129/12 129/19 145/12 146/25 158/19	MG000694 [1] 27/8
marijuana [3] 126/1 126/7 127/4	165/18 167/25 168/2 174/20 176/6	Michael [3] 118/14 119/4 140/25
mark [13] 14/10 15/17 19/19 19/21	183/17 205/18 205/21 205/23 205/24	Michelle [2] 174/12 200/7
20/15 97/8 98/13 142/9 168/21 169/20	205/25 206/1 206/3 206/5 207/24	mid [1] 194/10
169/22 184/7 184/15	209/17 209/20 211/9 213/16	mid-year [1] 194/10
marked [18] 50/16 50/20 52/12 71/13	Meaning [1] 7/4	middle [2] 1/1 169/2
72/16 72/21 83/22 131/9 131/14	means [11] 11/23 27/10 32/23 63/9	might [16] 16/2 25/22 29/7 74/1 101/7
133/23 134/1 141/3 141/7 142/13	94/11 99/5 113/9 113/19 130/24	135/6 146/15 148/13 148/15 151/2
145/5 165/24 169/25 202/16	130/25 206/6	185/15 190/19 203/14 204/6 209/13
Mason [14] 55/17 58/1 58/14 58/16	medical [1] 173/7	212/7
58/22 58/24 74/5 74/8 80/4 80/8 80/10	meet [2] 98/19 98/22	millennia [1] 145/13
166/4 166/24 192/23	meeting [13] 26/8 62/23 66/2 67/20	million [76] 11/5 29/13 34/16 35/3 35/5
master's [7] 117/7 117/13 117/16	68/6 68/16 70/16 70/25 98/18 99/6	35/8 35/9 35/11 35/13 35/13 35/16
117/18 117/20 123/18 124/3	101/1 154/18 217/12	35/19 35/21 35/22 35/24 37/2 37/2
math [1] 34/19	meeting's [1] 183/7	37/9 37/22 45/14 45/17 45/17 46/4
matter [2] 54/23 106/6	meetings [23] 13/8 13/9 13/10 13/12	46/17 46/22 46/22 46/25 47/4 47/5
Maultsby [2] 174/12 200/7	32/18 43/15 43/22 63/1 65/17 66/4	47/12 47/15 47/17 47/21 48/6 48/12
may [55] 10/2 13/6 13/7 21/8 27/25	66/5 67/5 67/16 67/17 68/7 68/17	48/21 49/6 49/7 49/16 50/1 51/23 52/5
27/25 28/16 31/21 34/2 34/24 44/13	69/15 69/23 70/2 70/6 70/20 74/1	52/17 53/2 53/6 160/4 180/20 181/2
50/23 62/17 72/4 80/16 100/24 106/18	212/11	181/13 181/15 181/16 181/23 182/5
106/25 107/24 114/16 117/8 131/17	meets [1] 211/19	186/13 186/16 186/17 186/23 187/2
131/21 131/22 132/2 132/2 132/8	Megan [2] 138/21 144/4	187/5 187/21 187/23 187/24 188/3
132/12 132/18 139/2 147/3 149/18	Meharry [7] 214/15 214/19 217/1 217/2	188/22 188/25 190/2 191/21 192/11
149/20 152/12 152/15 153/13 153/14	217/11 218/8 218/10	200/1 200/6 214/19 215/5 215/24
156/21 156/25 157/4 157/8 157/9	member [14] 21/23 63/10 66/22 67/2	217/19 218/7 218/10
158/24 159/2 159/7 159/8 184/11	70/13 70/15 92/16 99/18 99/21 100/9	mind [6] 104/12 109/10 203/21 206/8
186/3 188/9 189/20 190/15 190/18	101/12 101/12 101/14 123/13	207/12 208/13
192/4 192/5 205/4	members [20] 22/19 65/15 66/1 66/6	minds [1] 170/21
maybe [21] 18/16 24/5 48/1 59/23	66/9 66/14 66/23 69/16 69/23 70/3	minor [4] 126/14 176/14 215/2 215/4
71/25 72/2 72/6 73/2 92/11 92/11	70/7 70/11 95/4 98/18 99/13 99/16	minus [2] 125/13 125/14
92/15 147/8 155/10 158/2 159/13	100/18 100/19 100/21 101/6	minute [3] 18/20 66/22 158/7
163/6 177/17 182/15 183/17 208/24	memory [4] 51/4 65/7 157/13 175/17	minutes [10] 71/10 114/8 154/13 183/7

M	Ms. Steiner [3] 26/19 47/7 130/11 much [15] 33/8 41/19 82/16 91/2 117/3 145/24 159/15 168/4 168/9 177/7 179/15 187/17 187/19 192/6 194/24 multiple [2] 48/20 217/14 my [75] 5/11 6/9 7/9 8/11 9/19 10/2 12/10 13/22 20/11 21/17 22/22 23/20 25/14 26/20 32/21 33/15 33/15 36/13 47/3 47/8 49/3 49/4 53/13 53/15 53/25 62/4 70/19 72/13 73/13 74/2 77/18 86/2 86/11 86/17 110/24 117/2 118/4 123/7 130/16 130/19 131/8 137/8 141/17 145/25 152/13 157/2 157/12 157/13 157/15 161/15 163/7 163/12 172/10 179/13 179/16 183/3 186/8 192/5 195/2 196/13 200/16 201/5 201/21 201/25 203/6 205/17 206/8 207/12 208/12 214/5 214/5 214/11 216/3 219/11 219/21 myself [4] 86/17 105/8 134/24 218/4	108/17 108/19 109/1 109/1 109/17 109/19 109/20 111/19 112/2 113/21 114/18 118/19 118/24 119/7 120/23 121/1 121/6 123/9 126/5 126/20 127/15 128/8 128/16 128/24 128/24 129/10 129/23 130/11 130/16 131/11 132/7 132/15 132/17 132/21 133/18 134/2 137/19 138/18 140/25 142/14 145/6 145/20 145/24 148/12 148/19 148/20 150/1 150/8 150/22 152/4 152/25 153/4 154/3 154/7 154/10 154/22 154/23 156/1 156/4 156/6 156/13 158/13 158/20 162/14 164/10 165/8 165/20 171/5 171/11 171/18 171/21 171/25 172/4 172/8 172/16 172/24 173/18 174/14 175/7 175/10 175/13 175/24 176/6 176/9 178/6 178/17 179/2 179/6 179/8 180/24 181/5 185/6 185/13 186/18 187/18 187/25 188/11 193/16 197/9 198/21 198/24 199/2 199/5 199/11 199/25 200/10 200/10 200/12 206/9 208/5 208/24 210/12 210/25 212/8 212/18 213/16 216/13 216/16 216/19 216/25 no-bid [2] 216/13 216/16 nobody [1] 94/20 non [16] 87/20 88/1 88/17 89/10 89/16 89/21 90/2 90/6 90/19 97/9 97/10 99/6 162/22 163/11 163/12 163/24 non-public [1] 99/6 non-renew [8] 87/20 88/1 88/17 89/21 90/2 163/11 163/12 163/24 non-renewed [4] 90/6 97/9 97/10 162/22 non-renewing [2] 89/10 90/19 non-renews [1] 89/16 none [3] 68/10 130/16 131/7 nonprofit [2] 6/18 174/25 nonrenewing [3] 162/22 163/4 163/16 normally [1] 130/12 Norris [6] 204/11 204/11 205/10 207/17 208/8 208/17 North [11] 2/9 14/10 19/19 19/21 20/1 20/12 97/8 98/13 173/3 184/7 184/15 North's [4] 15/17 19/21 19/24 20/15 not [352] notes [16] 61/22 62/4 86/3 86/21 86/23 116/2 116/9 165/6 165/9 165/13 165/14 175/8 175/11 175/14 175/19 175/20 nothing [5] 74/2 74/2 124/10 133/17 208/12 notice [3] 3/1 3/3 139/12 November [1] 215/16 now [80] 5/19 9/9 9/14 10/11 14/15 17/19 23/8 23/16 27/16 34/16 35/5 36/20 36/24 37/15 38/13 38/14 39/15 40/5 41/4 43/13 52/15 54/8 56/25 58/19 58/21 60/2 61/19 64/21 71/1 74/5 75/6 75/20 76/25 77/1 78/6 80/1 81/1 96/3 98/16 108/7 109/4 109/23 111/12 112/15 114/3 115/21 116/1 116/14 117/6 120/20 121/2 123/22 125/20 134/9 137/15 141/13 143/15 148/3 149/24 151/9 152/2 157/11 159/9 162/21 163/24 165/24 168/19 177/16 177/19 178/15 179/16 180/15 184/2 184/3 187/5 188/7 188/17 189/25 201/20 217/6 number [41] 25/24 27/18 27/22 27/23
	N name [13] 5/5 9/19 16/5 17/21 36/13 37/19 113/2 121/13 131/23 200/16 200/23 206/8 219/21 names [1] 201/5 NASHVILLE [25] 1/2 1/6 1/12 1/20 2/9 3/2 3/13 3/19 3/24 6/9 6/15 20/11 22/3 23/5 26/12 35/2 79/3 118/6 140/15 173/6 194/17 195/9 196/21 198/5 198/9 nashville.gov [1] 3/25 nature [1] 97/2 necessarily [3] 13/19 145/9 193/2 necessary [5] 11/25 65/10 65/10 106/13 151/6 need [14] 9/16 11/19 23/24 38/25 72/24 73/4 139/15 154/5 154/8 157/18 169/3 174/9 187/15 211/16 needed [16] 43/4 43/7 53/19 56/19 59/9 60/6 61/2 61/6 97/17 153/2 154/5 158/16 173/13 174/6 176/25 209/10 needing [1] 173/14 needs [1] 110/20 negatively [1] 20/20 net [4] 160/12 187/19 187/25 197/19 never [13] 48/5 49/10 57/5 57/13 57/16 94/21 98/2 99/23 162/10 162/19 177/4 199/11 199/22 new [8] 11/15 12/9 76/21 76/21 80/17 110/6 110/23 111/4 newly [1] 57/10 next [4] 145/5 147/3 193/21 202/12 next-numbered [2] 145/5 202/12 nice [1] 117/9 no [214] 1/5 4/6 4/7 4/8 4/9 4/10 4/12 4/13 4/14 4/15 4/16 4/17 9/17 14/9 15/6 15/6 15/20 16/13 18/7 19/20 22/4 28/7 30/15 33/21 33/22 36/7 38/7 40/4 40/22 41/7 41/10 41/13 42/11 43/5 48/16 48/18 51/1 52/13 52/18 52/23 57/3 57/6 60/1 61/7 61/11 61/25 62/6 63/11 63/15 63/18 63/25 65/24 66/16 67/24 69/18 69/19 71/14 72/18 76/16 78/16 79/1 81/19 83/4 84/1 86/7 86/20 86/22 88/3 91/13 91/17 91/25 92/4 92/23 93/2 94/1 94/10 94/21 95/10 95/16 96/12 96/15 97/25 98/4 98/12 98/20 98/20 99/15 99/20 102/23 103/17 104/2 107/14 108/4 108/9	



<p><b>N</b></p> <p>number... [37] 27/24 28/2 40/8 50/17 50/20 52/9 52/12 71/10 71/13 72/17 72/21 83/18 83/19 83/22 83/24 110/16 125/22 131/10 131/14 133/23 134/1 141/4 141/7 142/10 142/13 166/1 168/15 168/16 169/4 169/5 169/25 185/21 188/5 202/16 209/9 209/21 219/20</p> <p>numbered [2] 145/5 202/12</p> <p>numbering [2] 27/7 27/13</p> <p>numbers [2] 27/17 83/11</p> <p>nurse [1] 180/9</p> <p>nurses [2] 25/10 25/13</p>	<p>84/8 84/10 112/18 114/5 136/8 139/5 139/7 139/16 142/18 143/6 148/8 165/1 165/11 167/13 168/1 168/8 170/3</p> <p>officers [1] 164/20</p> <p>offices [1] 3/2</p> <p>official [4] 20/8 20/9 20/10 21/24</p> <p>offset [1] 190/24</p> <p>often [5] 144/21 144/24 177/3 190/12 202/23</p> <p>Oftentimes [1] 64/18</p> <p>oh [3] 105/22 131/5 201/4</p> <p>okay [255]</p> <p>older [1] 51/8</p> <p>once [3] 9/4 133/11 146/11</p> <p>one [114] 9/8 9/14 13/9 13/9 19/4 23/3 23/14 24/5 24/21 27/7 29/7 30/5 34/13 34/17 34/17 43/8 43/11 45/2 49/14 51/12 52/17 53/2 53/6 55/8 55/8 55/16 60/1 60/6 61/1 62/12 65/15 66/21 67/1 67/2 67/7 68/16 69/15 69/15 69/17 71/1 71/8 79/3 80/20 81/2 81/20 82/12 83/4 98/13 98/22 99/4 99/18 101/12 109/5 112/10 112/24 113/15 116/19 123/25 130/10 130/15 131/4 131/4 131/17 132/8 143/17 144/9 144/12 147/6 150/23 150/25 154/23 155/10 155/14 158/14 166/8 166/10 167/6 167/8 168/22 169/7 171/7 172/12 174/9 184/22 186/20 186/24 187/3 187/11 188/8 188/9 188/10 190/23 191/10 192/10 193/11 194/14 204/13 207/8 207/14 207/15 208/5 208/9 208/11 211/14 212/22 212/25 213/2 214/22 214/25 215/3 217/24 218/18 218/18 218/18</p> <p>one million [1] 53/6</p> <p>one-off [1] 194/14</p> <p>one-time [7] 186/20 186/24 188/8 188/9 218/18 218/18 218/18</p> <p>one-way [1] 99/4</p> <p>ones [6] 51/8 59/16 65/15 110/23 111/4 131/22</p> <p>ongoing [2] 170/15 209/12</p> <p>online [3] 5/20 115/1 123/21</p> <p>only [18] 9/14 19/4 35/8 35/10 40/13 41/16 43/8 43/11 46/21 48/24 81/2 86/12 112/24 139/8 150/23 157/1 180/3 196/24</p> <p>open [4] 128/18 141/14 162/2 215/20</p> <p>open-ended [1] 162/2</p> <p>opening [1] 57/17</p> <p>operating [15] 4/6 4/7 26/13 26/21 28/23 35/6 35/23 45/24 76/22 165/1 168/10 168/11 188/16 188/20 189/14</p> <p>operation [1] 199/19</p> <p>operational [1] 110/20</p> <p>operations [8] 28/25 74/16 165/5 169/2 169/10 169/11 169/13 169/15</p> <p>opinion [4] 105/13 105/15 105/20 192/6</p> <p>opportunity [1] 162/5</p> <p>opposed [5] 59/10 80/21 112/11 203/3 203/12</p> <p>oppression [1] 145/13</p> <p>option [1] 53/25</p> <p>options [2] 59/17 117/4</p> <p>order [4] 17/11 151/2 153/13 153/18</p> <p>ordered [9] 147/25 150/12 150/13 150/14 150/18 152/16 153/9 153/15 153/16</p>	<p>org [3] 83/14 84/12 167/4</p> <p>organization [4] 79/3 83/4 199/19 212/9</p> <p>organizational [9] 4/10 4/16 38/1 54/14 54/16 59/20 60/5 168/20 169/14</p> <p>organizationally [1] 59/6</p> <p>original [2] 138/19 195/21</p> <p>originally [1] 206/20</p> <p>os [1] 58/8</p> <p>other [60] 7/6 7/10 7/14 7/20 8/1 8/22 30/15 33/1 34/2 42/3 43/17 44/7 45/7 47/18 49/9 53/2 53/6 59/10 59/11 60/24 71/8 72/12 75/7 82/7 82/8 99/6 99/8 99/12 99/16 100/18 100/18 103/18 106/19 111/8 117/4 119/5 120/24 126/14 128/4 129/15 136/9 157/20 158/17 190/20 197/18 200/3 203/3 203/5 203/13 204/2 204/23 205/4 205/4 205/12 206/14 208/12 209/24 213/2 213/4 216/23</p> <p>otherwise [1] 152/22</p> <p>our [56] 11/9 13/2 13/4 27/13 33/6 33/12 35/4 35/16 42/6 48/17 48/17 54/17 54/20 54/20 75/4 82/13 83/5 101/21 106/10 106/11 123/12 124/20 124/20 124/23 137/8 147/12 147/17 179/23 179/24 180/2 180/3 181/23 183/2 185/14 187/12 187/20 187/22 187/22 188/1 188/14 189/11 192/3 194/24 198/6 204/7 206/17 206/19 207/4 208/1 209/10 209/22 211/17 212/11 212/11 215/17 216/7</p> <p>out [59] 8/7 11/6 16/24 20/21 24/9 25/11 29/12 29/22 30/2 31/14 32/3 33/19 40/6 41/2 45/15 47/4 49/14 50/25 51/23 59/10 75/6 78/22 81/23 82/9 92/7 101/12 114/25 116/17 120/16 120/17 120/18 120/19 124/24 128/12 143/16 143/23 144/19 146/21 159/7 160/6 161/12 164/14 183/1 183/18 188/13 197/20 200/6 202/20 203/11 204/10 204/21 205/2 205/4 207/7 207/15 207/20 207/22 208/12 210/4</p> <p>outcome [1] 219/16</p> <p>outside [7] 61/4 110/24 138/20 165/16 165/18 167/7 171/3</p> <p>over [37] 6/11 6/16 7/25 11/11 15/17 29/8 33/11 33/13 34/12 40/25 45/9 67/4 75/25 85/22 87/19 88/13 89/3 90/1 90/5 90/13 90/14 90/19 99/21 137/11 154/20 176/3 176/19 180/15 182/6 188/19 188/22 190/20 193/6 193/10 194/9 203/23 204/12</p> <p>overage [1] 41/18</p> <p>overall [2] 169/14 197/13</p> <p>overlapping [1] 143/22</p> <p>overpayment [1] 42/14</p> <p>oversee [4] 70/11 78/7 204/25 205/1</p> <p>overseeing [5] 54/3 88/24 90/11 110/16 179/20</p> <p>oversight [2] 160/21 162/18</p> <p>owe [2] 179/23 179/25</p> <p>own [5] 27/13 29/1 66/23 138/6 212/22</p> <p>owner [8] 25/6 25/25 28/19 29/1 31/14 39/12 43/8 43/11</p> <p>owners [8] 25/4 29/3 29/14 29/19 30/21 31/18 43/24 155/17</p> <p><b>P</b></p> <p>P-U-E-N-T-E [1] 150/16</p>
---	--	---

<b>P</b>		
p.m [1] 184/9	periods [1] 12/5	21/2 36/1 36/5 36/8 36/12 39/7 54/1
P.O [2] 3/19 3/24	Perry [2] 90/1 90/6	54/5 54/7 55/8 55/11 55/15 55/21 56/4
package [1] 214/24	person [27] 16/3 16/4 17/1 25/12 78/7	56/5 56/9 56/12 56/15 56/19 56/21
packet [3] 141/8 141/10 141/16	79/20 80/20 89/10 105/21 106/18	56/23 57/1 57/10 57/14 57/18 57/22
page [31] 4/2 4/2 4/3 4/6 4/7 4/8 4/9	106/19 106/24 107/24 147/1 150/17	57/25 58/4 58/12 59/10 60/9 60/10
4/10 4/12 4/13 4/14 4/15 4/16 4/17	150/20 151/1 154/1 172/12 176/23	68/20 69/10 79/11 80/5 84/14 84/17
10/4 27/13 38/25 51/16 64/1 64/14	203/23 207/9 209/13 211/15 212/3	84/24 91/8 93/10 93/12 98/8 103/7
83/10 121/5 121/14 121/25 124/5	215/19 217/7	103/11 104/9 105/9 105/11 106/12
131/24 136/2 141/22 149/5 149/15	person's [1] 76/5	107/2 107/3 107/16 108/2 108/15
168/15	personal [4] 21/17 130/13 131/7 195/2	108/18 111/14 111/20 112/16 113/3
pages [2] 202/1 219/9	personally [2] 156/2 199/22	115/3 117/6 119/20 120/11 120/21
paid [4] 41/17 41/25 119/9 130/10	personnel [7] 43/19 44/8 44/13 44/17	123/8 124/17 125/2 138/23 139/9
pandemic [9] 34/24 67/4 76/19 76/23	45/5 45/12 120/25	139/22 140/6 143/17 146/4 146/8
77/4 182/14 182/21 182/24 186/22	pertaining [1] 163/22	147/20 160/22 166/7 166/11 167/18
panel [4] 174/17 174/22 174/23 208/18	phases [1] 34/24	167/21 170/12 180/14 190/16 192/22
panels [7] 174/18 174/19 175/2 175/5	PhD [1] 177/18	200/8 204/18 205/3 207/1 207/2
175/6 175/9 208/20	philanthropic [1] 167/14	207/12 208/2 208/4 211/4 212/2
parameters [2] 100/6 101/3	philosophies [1] 188/16	212/16
parent [4] 87/10 93/24 96/11 97/24	phone [3] 157/15 200/19 201/2	positions [45] 25/4 37/25 46/15 47/22
parentheses [1] 201/6	phrase [7] 35/14 37/9 98/2 162/25	48/25 54/9 59/14 61/24 69/24 73/11
parents [1] 20/15	163/4 163/8 216/20	74/11 74/17 74/18 74/24 75/4 75/8
part [19] 29/16 75/15 95/20 95/23 96/2	phrase that [1] 163/4	75/9 80/2 86/4 104/5 104/7 104/8
101/20 113/25 114/23 116/22 120/16	phrasing [2] 33/2 106/1	104/17 104/23 106/3 109/3 109/13
133/19 160/21 171/11 176/14 186/22	picture [2] 122/16 218/1	110/1 110/13 111/2 113/15 143/17
199/7 199/9 201/21 215/2	piece [2] 116/20 139/2	146/18 148/6 166/11 166/18 171/7
particular [8] 15/25 42/21 45/2 68/5	pieces [1] 179/22	192/4 192/8 199/7 199/8 199/13 209/9
68/16 69/24 113/23 193/18	PIPPA [11] 1/16 3/10 87/18 87/25	209/21 211/23
parties [1] 219/14	88/12 88/16 102/13 103/10 189/17	possession [8] 122/22 123/1 126/1
parts [2] 31/22 182/17	198/22 199/9	126/7 126/16 127/4 132/2 133/4
party [6] 21/21 21/23 26/6 119/13	place [2] 130/15 206/23	possible [17] 33/8 44/23 45/4 49/13
119/16 144/1	places [1] 45/11	54/19 75/3 80/25 110/14 119/25
pass [2] 92/21 191/2	Plaintiff [3] 1/4 1/10 3/15	177/10 188/3 188/5 190/7 208/14
passion [2] 170/21 204/3	plaintiffs [4] 1/18 3/1 3/8 9/20	208/16 215/17 215/20
past [8] 13/4 34/8 45/9 134/10 139/19	plan [19] 63/20 64/22 65/4 65/10 65/18	possibly [3] 12/13 151/18 208/8
174/22 210/24 211/2	66/9 66/10 67/7 67/10 67/25 68/3	post [3] 15/23 17/2 218/4
paths [1] 96/5	68/11 70/4 70/8 71/3 75/4 100/19	posted [9] 15/9 15/19 16/22 19/13
PATRICK [4] 1/24 3/1 5/1 5/7	138/19 182/4	56/22 57/4 57/18 146/11 217/25
pay [8] 91/1 102/21 103/3 107/13	planned [5] 31/15 65/21 173/5 173/5	posting [2] 56/20 57/16
107/16 177/14 215/25 218/15	193/2	potential [7] 15/21 15/24 21/8 32/6
paying [1] 160/5	played [3] 156/20 157/6 158/19	32/15 32/17 43/25
peak [1] 215/15	Playing [1] 152/6	Powerpoint [2] 64/17 64/18
Pearl [3] 97/4 97/18 97/20	please [3] 5/5 10/8 206/11	practical [1] 54/23
Pearl-Cohn [3] 97/4 97/18 97/20	pled [1] 132/1	practice [5] 66/21 100/16 100/17
peer [1] 194/24	plenty [1] 162/5	101/21 113/24
peers [2] 207/10 207/10	PLLC [1] 3/18	prank [3] 94/15 94/15 94/17
pending [1] 130/6	plugged [1] 208/9	precise [11] 17/21 25/23 30/16 59/19
people [50] 8/22 19/13 22/9 29/6 29/7	plus [3] 125/8 162/6 187/2	59/24 93/15 96/25 162/3 164/5 182/13
31/7 33/12 33/14 34/14 42/5 64/19	point [25] 38/2 41/2 45/20 47/11 55/7	195/10
72/12 81/6 85/15 104/11 104/11	55/10 56/17 77/20 77/22 122/8 122/11	precisely [11] 17/25 18/16 21/22 31/12
104/18 106/3 106/4 106/8 109/13	123/10 137/3 145/24 147/19 151/7	39/6 39/25 40/23 72/2 89/18 170/23
111/11 113/20 113/24 114/4 115/21	157/7 164/18 171/16 188/13 189/11	210/12
128/18 133/10 140/14 145/14 160/15	205/10 207/22 210/9 215/15	preferred [4] 133/13 147/9 147/15
160/18 161/5 165/10 172/12 174/25	pointed [1] 71/5	147/25
176/23 179/21 194/18 198/15 205/4	pointing [1] 46/25	prepare [1] 86/13
205/4 206/2 207/24 209/7 209/25	policies [5] 124/21 124/22 161/11	prepared [3] 100/25 148/23 184/15
210/21 211/11 212/9 215/22	161/15 161/16	present [14] 12/3 13/12 23/1 39/21
people's [1] 72/14	policy [4] 25/4 100/7 144/14 144/21	40/2 40/18 65/23 67/19 135/15 135/23
per [2] 37/9 197/20	political [14] 18/8 18/11 19/10 19/15	142/18 143/5 186/19 189/4
percent [10] 34/17 34/17 43/9 104/11	20/4 20/22 21/14 21/15 124/9 124/20	presentation [1] 22/23
159/16 185/16 197/1 214/2 214/7	124/20 143/25 144/16 144/19	presentations [2] 22/25 64/17
217/22	politically [1] 20/16	presented [7] 23/13 39/23 73/25 80/14
perfect [1] 123/13	pool [7] 119/25 120/4 120/4 120/16	154/19 155/4 155/7
performance [9] 91/23 92/3 178/10	170/14 209/1 212/15	presents [1] 40/17
189/24 198/20 198/23 199/1 199/4	pools [2] 15/21 15/25	president [1] 21/19
199/9	poor [1] 131/1	presidential [2] 118/8 118/12
performed [1] 212/1	pop [1] 206/8	pressed [1] 38/2
performer [1] 36/21	portion [1] 43/12	pressure [1] 33/7
perhaps [2] 74/20 212/4	position [113] 6/22 6/25 7/1 7/12 9/10	pressures [1] 189/9
period [3] 26/23 34/12 172/19	14/4 14/15 14/17 14/19 15/17 15/20	presume [1] 133/19
	16/5 16/11 16/22 18/18 19/4 20/3 21/1	pretty [6] 8/18 164/5 192/15 201/25

<b>P</b>	proposed [4] 45/25 49/25 50/24 51/17 pros [2] 194/2 194/4 protect [1] 106/10 protected [14] 102/1 102/7 102/18 102/20 103/15 103/17 103/18 103/23 105/4 105/7 105/23 108/12 108/22 109/9 protection [1] 101/3 protective [2] 102/12 104/12 provide [6] 33/11 72/12 73/15 73/19 74/5 214/19 provided [7] 59/2 62/3 64/3 64/14 65/3 72/9 133/14 provides [1] 74/8 providing [2] 58/25 99/7 provisions [2] 3/3 102/1 public [26] 6/8 6/15 12/4 12/4 12/5 12/6 13/8 23/2 23/3 23/5 26/12 34/9 66/2 67/18 67/20 70/24 79/3 99/6 137/13 138/9 144/13 144/21 195/8 198/12 212/8 212/10 publicly [1] 22/25 Puente [1] 150/15 pull [5] 11/5 51/7 157/16 191/7 200/20 pulled [2] 64/16 141/9 pulling [1] 158/25 punk [2] 94/11 94/20 purchasing [1] 28/24 purely [2] 30/19 185/19 purpose [1] 200/2 purposes [1] 78/1 purposing [1] 166/10 pursuant [1] 3/2 put [18] 7/1 11/9 39/11 64/4 64/9 100/6 101/4 127/11 138/10 139/16 152/19 153/23 155/11 155/14 155/23 161/3 161/7 204/6 puts [2] 143/20 162/8 putting [1] 12/11	quite [2] 189/2 197/19
pretty... [2] 202/25 213/18 previous [10] 11/6 14/24 23/4 64/10 77/19 80/15 91/7 133/20 146/5 194/7 previously [11] 50/19 52/11 71/12 72/20 83/21 131/13 133/25 141/6 142/12 169/24 202/15 previously-mentioned [11] 50/19 52/11 71/12 72/20 83/21 131/13 133/25 141/6 142/12 169/24 202/15 primary [1] 212/25 Primrose [4] 195/9 212/23 213/1 213/20 principal [25] 7/23 60/19 75/11 78/12 79/8 79/8 81/2 82/18 82/21 87/19 88/13 89/2 89/5 89/9 89/14 89/19 90/22 110/21 163/6 164/9 166/20 202/21 203/2 203/9 203/19 principals [27] 60/25 75/22 76/7 76/14 76/25 77/6 77/11 77/24 78/13 78/23 79/14 79/17 80/6 81/12 82/1 82/3 82/8 85/4 85/13 110/14 163/17 202/22 202/24 203/3 203/5 203/13 204/14 principals' [1] 78/4 prior [5] 11/17 81/20 118/7 118/22 182/3 priority [1] 7/25 Priscilla [1] 150/15 private [2] 67/16 70/15 privy [1] 199/17 probably [22] 28/7 29/16 67/3 67/22 72/12 80/15 107/4 112/9 114/11 159/1 161/3 161/6 165/3 165/4 176/12 179/14 183/4 183/8 184/16 199/16 205/16 211/3 problem [2] 61/20 206/3 problems [2] 74/25 85/17 Procedure [1] 3/3 process [30] 8/23 10/22 11/3 31/4 31/16 31/19 43/9 113/18 114/1 114/22 114/23 115/15 128/19 133/8 147/10 152/1 160/20 170/15 171/12 172/10 181/24 204/21 205/1 208/22 209/3 209/8 209/12 209/15 209/23 210/19 processing [1] 160/19 produce [1] 61/19 produced [5] 64/12 64/13 71/19 83/9 121/3 profile [5] 4/17 143/9 143/13 143/15 202/13 profit [1] 218/7 program [1] 64/19 programmatic [1] 25/8 programs [3] 167/13 168/1 216/8 progresses [1] 147/2 prohibit [1] 101/20 prohibited [1] 103/2 prohibition [1] 99/20 prohibitions [1] 99/15 projected [2] 187/20 187/24 projection [1] 187/9 projections [1] 187/23 promoted [2] 160/24 211/2 promotions [1] 116/5 proper [2] 175/23 175/25 properly [1] 12/13 property [18] 20/2 194/16 194/17 194/23 195/1 195/2 195/11 195/14 195/18 195/19 197/5 197/12 197/16 197/17 198/4 213/7 213/9 213/21	<b>R</b> R-Y-L-E [1] 5/8 race [3] 6/12 6/14 139/1 raised [1] 194/17 Randolph [1] 167/17 ranking [1] 20/10 rate [1] 131/1 rather [3] 35/7 47/4 168/8 re [2] 166/10 200/2 re-purpose [1] 200/2 re-purposing [1] 166/10 reach [9] 60/25 120/17 120/18 120/19 207/7 207/15 207/20 207/22 210/4 reached [5] 146/21 202/20 204/10 205/2 205/4 reaching [3] 16/24 120/15 204/21 read [3] 127/13 185/3 186/1 reading [2] 3/4 214/3 real [3] 63/9 165/23 189/5 realistic [1] 12/18 really [19] 7/13 38/7 50/12 68/9 70/24 81/25 89/13 92/10 93/15 96/9 96/11 96/14 106/15 110/21 116/10 133/9 157/22 192/11 204/24 reapply [1] 179/12 reappraisal [6] 195/1 195/18 195/22 196/1 196/5 197/12 reappraised [2] 195/11 195/13 reason [17] 30/1 30/7 30/15 30/19 54/13 75/7 82/23 88/20 155/24 156/7 162/10 162/14 162/19 178/6 185/7 213/15 217/6 reasonable [2] 159/13 215/24 reasons [10] 30/4 54/12 54/15 54/16 70/18 77/25 84/25 106/12 174/4 174/11 recall [22] 17/7 17/8 34/24 37/6 39/25 64/5 64/24 65/8 67/24 69/19 69/20 86/10 129/13 151/9 151/12 151/17 154/18 154/19 155/4 167/3 209/6 210/3 receiving [1] 190/16 recently [3] 9/12 184/23 184/24 reckless [1] 132/10 recognize [2] 71/22 184/25 recollection [3] 31/7 40/1 40/15 record [24] 4/13 5/6 5/13 5/15 9/16 26/9 36/14 65/2 109/6 121/20 122/5 122/10 123/4 131/18 146/24 147/5 147/24 152/16 158/25 168/15 195/8 202/8 202/10 219/10 recorded [2] 152/2 157/6 recorder [1] 152/11 recording [4] 152/6 156/20 157/5 157/7 records [6] 27/12 114/17 114/20 133/17 143/11 147/14 recurring [1] 186/20 Redirect [2] 4/3 218/14 reduce [7] 29/12 29/22 32/3 41/5 51/23 59/9 200/6 reduced [5] 30/2 31/19 48/23 187/20 187/22 reducing [1] 84/18 reduction [5] 29/23 32/2 35/16 46/15 192/11 reductions [3] 46/1 47/1 160/11 refer [2] 5/9 160/2 reference [2] 92/13 144/4	
<b>Q</b>	qualifications [9] 16/1 113/10 114/2 117/10 120/14 133/11 178/23 178/24 211/12 qualified [20] 113/4 113/5 113/6 113/7 113/16 113/20 113/25 116/15 170/3 170/6 170/14 177/8 177/25 178/2 178/7 178/11 178/18 189/18 211/3 211/14 qualifies [1] 189/21 quarter [1] 35/3 quarterly [2] 31/19 32/18 Queen [1] 168/14 question [59] 8/11 10/4 12/10 15/14 15/19 24/12 27/1 27/25 29/17 32/21 33/2 33/15 33/15 39/18 40/5 40/23 42/25 44/3 47/3 49/3 53/4 56/13 60/2 60/7 63/8 66/3 78/6 86/13 96/22 97/1 98/3 99/14 101/9 104/20 107/5 109/18 115/17 124/1 126/4 126/19 127/9 154/22 155/13 186/7 186/8 190/1 190/4 193/14 193/17 195/13 203/6 203/24 205/6 206/11 214/5 214/6 214/11 216/12 216/12 questioned [1] 91/15 questions [20] 3/5 9/22 10/3 33/23 66/11 66/12 67/13 67/16 69/24 70/20 100/23 114/12 162/3 162/4 166/2 176/13 184/8 184/14 184/21 200/18 quick [2] 63/9 165/24	



<b>R</b>		
referenced [1] 81/25	68/2 92/1	59/21 83/16 86/24 89/6 99/11 105/21
references [1] 118/18	reorganizing [1] 54/4	114/24 123/22 127/10 134/9 144/6
referencing [3] 166/8 166/22 167/2	repeat [4] 43/1 53/4 83/11 85/1	146/21 152/12 159/20 159/24 159/25
referred [4] 59/16 112/22 113/1 169/15	rephrase [11] 9/24 10/3 11/2 15/13	174/4 175/18 177/20 179/23 179/24
referring [8] 35/1 47/22 60/1 101/8	24/12 39/19 56/13 96/21 99/14 203/7	180/14 184/3 191/13 191/17 196/15
122/18 140/6 163/5 208/6	206/11	205/12 209/11 209/17 212/7 212/9
reflect [1] 123/12	replaced [1] 41/20	214/1
reflected [1] 183/6	report [14] 28/15 56/1 56/7 76/8 77/13	rightly [1] 26/20
refunded [1] 182/2	79/14 79/17 79/20 80/6 80/7 80/10	rights [1] 161/13
refuses [1] 102/5	102/6 218/3 218/5	rise [3] 211/15 211/19 212/6
regard [9] 10/24 53/21 77/9 77/12	reported [12] 55/1 55/6 55/9 55/13 56/3	role [20] 18/1 18/5 20/4 21/17 21/24
77/13 85/21 101/5 111/25 116/5	56/4 77/6 78/23 79/11 80/11 154/24	55/19 55/20 55/20 57/11 61/3 61/5
regarding [3] 185/22 212/15 214/15	219/8	69/3 69/3 85/11 120/14 120/15 138/24
Regardless [1] 157/8	reporter [5] 6/24 14/4 62/5 219/7	139/16 168/5 203/18
Register [1] 161/7	219/20	roles [2] 167/8 208/10
registered [1] 126/16	REPORTER'S [1] 218/22	roll [1] 25/11
registration [1] 127/19	reporting [14] 54/17 58/7 58/11 58/16	round [2] 196/7 210/10
regular [5] 31/16 31/22 66/6 66/21 74/2	58/20 61/9 80/20 82/3 84/4 84/7 84/8	roundly [2] 100/20 100/23
regularly [1] 65/15	84/11 84/12 219/19	Rules [1] 3/3
rehire [2] 97/11 97/14	reports [5] 14/11 78/7 79/6 79/8 79/9	rumors [1] 120/24
reimbursed [1] 181/21	represent [2] 9/20 200/17	run [6] 6/14 6/18 12/13 95/13 95/15
reimbursement [1] 216/9	representative [4] 18/12 18/22 18/22	138/5
related [7] 61/20 104/17 116/20 117/4	18/24	runner [1] 151/20
148/13 214/20 219/13	represents [1] 9/21	running [1] 118/5
relates [4] 205/22 205/23 206/6 208/8	repurposed [1] 146/5	runs [2] 24/22 138/3
relating [1] 129/7	request [2] 117/6 153/20	RYLE [4] 1/24 3/1 5/1 5/7
relation [1] 161/4	requested [4] 149/17 149/18 153/21	
relations [14] 6/16 8/1 10/15 14/9 15/2	187/4	<b>S</b>
15/18 16/21 18/1 19/4 21/2 22/13	required [3] 11/16 40/14 183/9	said [19] 18/20 34/4 34/21 35/18 48/5
26/22 27/3 28/6	requirement [2] 69/9 69/13	66/13 71/6 77/11 80/13 111/19 136/24
relationship [1] 204/15	requirements [1] 183/9	158/14 158/15 158/20 172/2 174/21
relationships [5] 19/12 19/15 19/16	requires [4] 115/16 116/4 128/16	195/15 203/25 208/21
21/8 21/9	128/17	SAITH [1] 218/21
relatively [1] 25/9	reserved [1] 3/5	salaries [2] 25/11 189/15
relevance [1] 138/15	resources [13] 11/15 27/20 28/3 28/10	salary [5] 119/9 167/20 168/6 177/18
relevant [2] 106/7 109/14	54/4 59/18 65/5 72/1 88/21 153/19	193/9
rely [1] 194/5	165/2 165/5 173/13	same [26] 10/4 19/2 28/21 52/22 58/21
relying [1] 72/11	respond [2] 199/18 199/24	59/1 80/17 81/24 98/19 99/7 111/9
remained [1] 78/5	responding [1] 199/21	113/13 115/18 123/14 132/23 152/3
remember [66] 17/11 17/21 21/22	response [4] 17/6 17/8 214/24 217/15	153/7 153/8 158/13 163/25 164/2
33/22 45/20 47/2 49/14 59/19 59/24	responsibility [1] 160/20	168/20 179/22 192/10 197/23 197/25
65/1 66/20 67/22 68/4 68/4 68/7 69/12	responsible [9] 25/2 25/8 25/12 26/6	same-day [1] 152/3
72/2 82/12 88/10 110/9 114/11 117/14	28/17 75/23 89/10 161/10 188/12	save [4] 46/21 147/16 186/13 187/2
119/7 119/8 134/18 136/21 136/22	rest [2] 64/7 64/8	saving [2] 159/23 160/4
137/3 137/19 146/9 146/15 146/18	result [1] 186/9	savings [12] 43/25 46/4 46/16 47/9
148/12 148/17 156/22 157/2 161/3	resulted [1] 186/23	47/21 48/22 51/17 185/22 186/21
162/3 167/5 167/22 170/22 172/21	results [1] 128/20	186/23 187/5 200/2
172/22 172/23 174/16 175/19 176/13	resume [1] 145/5	saw [5] 8/5 139/14 142/2 142/23
182/13 182/16 182/20 184/20 193/13	resumé [11] 4/15 123/23 136/24 141/9	152/18
194/22 194/23 195/1 196/13 204/11	141/14 143/16 143/18 143/24 144/2	say [55] 7/19 8/20 8/21 9/16 11/21
207/13 207/21 208/11 208/15 209/4	144/10 211/25	16/17 17/3 22/21 24/6 28/14 32/1
212/14 212/19 215/8 215/13	retaliate [3] 106/20 106/25 107/25	32/24 33/18 36/11 46/20 70/5 70/16
remembering [2] 30/17 195/20	retaliating [2] 103/2 152/23	70/23 77/10 85/23 86/3 87/22 88/3
remind [3] 86/17 156/18 182/22	retaliation [3] 102/1 103/5 165/16	92/8 93/5 94/25 96/6 98/6 101/6
remove [1] 80/24	retired [1] 111/11	101/18 105/22 108/9 119/14 125/7
removed [1] 40/12	retirements [1] 179/21	128/3 135/22 138/4 147/9 154/3
removes [2] 85/13 85/14	retiring [1] 203/15	162/10 169/12 177/8 190/13 198/19
renew [8] 87/20 88/1 88/17 89/21 90/2	return [1] 6/23	198/22 198/25 199/3 199/6 199/25
163/11 163/12 163/24	returned [1] 6/20	203/7 203/8 206/12 209/16 211/8
renewed [4] 90/6 97/9 97/10 162/22	reveal [1] 127/5	211/20
renewing [2] 89/10 90/19	reveals [2] 126/15 128/2	saying [14] 37/1 49/10 51/1 51/3 57/7
renews [1] 89/16	revenue [4] 187/17 187/20 187/25	57/7 76/12 81/9 88/20 89/18 99/21
Renita [2] 90/1 90/6	196/3	102/9 186/2 218/2
rental [1] 213/7	review [6] 50/13 51/5 153/12 176/12	says [29] 40/2 40/9 51/10 62/20 64/1
reorg [15] 46/3 46/7 53/21 61/20 66/2	177/17 189/23	100/8 101/5 124/8 125/22 125/23
66/9 67/7 67/25 68/11 71/2 71/7	reviewed [3] 157/1 178/10 216/7	125/25 126/13 126/25 127/23 127/25
112/10 160/5 164/22 165/7	reviewing [1] 63/23	135/14 135/17 135/23 135/25 136/3
reorganization [12] 30/8 30/11 53/17	reviews [1] 45/8	142/16 156/25 169/1 169/11 186/8
54/2 54/7 63/20 64/22 65/4 65/9 65/18	rid [3] 37/23 38/4 146/6	191/18 197/11 201/6 213/13
	right [37] 8/17 9/9 19/23 20/17 47/12	scandal [1] 138/21

S	154/13 169/16	shared [1] 127/8
scheduled [1] 77/3	secondary [1] 157/7	sharing [1] 51/9
school [145] 4/8 6/5 6/17 12/5 12/20	secretary [4] 63/6 63/9 63/17 137/23	shark [3] 130/18 130/19 130/22
14/16 14/20 25/10 25/12 25/20 26/12	section [1] 127/3	she [187] 7/10 7/11 7/13 7/13 7/15
28/16 28/24 28/25 30/12 32/4 33/10	see [115] 12/22 16/10 16/24 17/12	7/16 7/17 7/19 7/23 7/23 7/24 8/6 8/14
36/2 36/6 36/22 38/14 38/18 39/2 39/4	17/14 17/15 26/7 26/11 27/17 29/20	8/21 8/24 16/17 17/3 20/4 20/7 20/9
39/8 39/12 39/24 40/8 40/9 41/6 42/14	30/22 31/10 31/23 38/14 40/7 40/11	36/21 36/21 38/20 39/2 39/4 39/6 39/8
53/16 53/25 54/5 54/21 55/11 57/10	43/17 44/6 44/17 45/6 45/23 45/25	39/12 40/2 40/17 40/18 42/5 56/18
58/10 59/17 59/22 62/16 63/3 63/13	46/3 47/8 51/9 51/10 51/14 51/17	56/19 56/20 56/22 57/4 57/7 57/9
65/9 65/15 65/16 65/17 66/1 66/4 66/5	53/24 59/8 60/6 61/5 61/8 62/10 62/12	57/13 63/14 65/14 65/17 65/21 66/6
67/20 68/6 68/6 68/19 69/3 69/9 69/16	63/6 63/16 63/19 64/2 64/21 66/10	66/8 66/18 67/6 67/9 67/10 67/12
69/23 70/2 70/6 70/10 70/12 70/15	66/11 66/11 71/16 72/8 83/13 83/16	67/14 81/24 82/7 82/11 87/2 87/25
71/10 75/11 75/14 75/18 76/1 76/3	84/3 85/9 121/4 121/11 123/20 123/25	90/1 90/3 90/5 90/10 90/13 90/15 91/6
76/4 76/15 76/17 76/18 88/24 90/24	124/3 124/5 124/8 124/24 124/25	91/19 94/8 94/25 95/2 98/19 98/22
93/4 93/13 95/3 95/9 95/14 95/15	125/20 125/24 126/2 126/3 126/17	99/1 99/2 99/3 99/6 99/12 100/2 100/2
95/17 95/20 95/21 95/22 95/25 96/1	126/18 126/25 127/19 128/23 130/5	100/4 100/20 100/23 101/4 101/5
96/1 97/4 98/18 100/18 100/18 100/20	131/16 131/18 133/1 134/5 135/12	102/19 102/20 103/23 104/7 104/8
101/1 101/6 117/4 121/19 122/3	135/19 137/5 140/19 140/25 141/20	104/10 104/15 104/22 104/22 105/3
123/13 123/15 145/2 154/21 155/1	142/16 142/19 143/20 143/23 144/8	107/16 108/11 108/11 111/15 111/17
159/8 160/17 161/16 161/25 162/17	148/25 149/1 149/3 149/6 149/8	111/20 111/21 113/3 113/4 113/5
166/6 166/9 166/14 167/1 169/2	149/17 149/19 151/25 153/22 156/23	116/16 116/18 116/21 116/24 117/2
169/10 169/12 169/13 170/22 173/4	157/18 157/19 157/20 158/17 159/2	117/3 117/5 117/17 117/18 120/8
173/25 176/11 176/16 176/21 177/14	168/22 168/25 169/3 171/9 184/2	120/10 120/17 120/21 129/9 129/17
180/6 180/9 182/9 182/15 182/15	184/9 185/23 186/8 191/12 191/14	129/21 138/22 139/14 146/14 146/21
183/6 183/9 183/11 183/12 183/15	191/17 196/8 196/9 196/9 196/14	147/10 147/12 150/12 150/14 150/18
183/21 187/1 194/9 198/6 203/21	205/3 207/15	154/8 154/23 155/4 155/7 155/22
204/1 204/3 212/11 215/18 216/5	seeing [2] 64/24 132/4	155/22 157/5 157/7 158/14 158/15
217/8 217/12	seek [4] 12/15 21/13 106/14 119/25	158/15 158/20 158/22 158/23 159/5
school-based [1] 33/10	seem [2] 162/16 200/23	161/6 161/10 161/15 161/17 161/21
schools [102] 6/15 6/19 7/25 10/17	seemed [2] 60/17 179/15	162/4 162/8 162/13 162/16 163/6
10/24 12/13 12/21 16/12 23/5 25/11	seems [10] 12/11 13/22 20/17 51/21	167/18 170/6 171/19 173/2 176/20
35/2 40/18 41/24 43/7 50/4 54/3 54/18	105/8 112/8 156/23 164/4 185/1 217/7	176/22 176/24 177/2 177/2 177/7
55/9 55/14 55/20 56/6 56/7 56/8 56/14	seen [5] 63/22 99/23 141/25 184/23	177/21 178/2 178/5 178/5 178/6
56/22 56/25 57/2 57/14 57/17 57/24	212/4	178/11 178/15 178/18 178/23 178/25
58/8 58/17 58/25 59/5 60/22 60/23	selected [3] 151/7 203/22 211/16	179/3 179/3 179/4 198/22 198/25
61/12 75/12 77/21 77/23 78/11 78/19	selections [1] 179/24	199/3 199/6 199/11 200/8 204/13
78/24 79/4 80/5 80/18 81/1 81/3 82/6	Senator [5] 18/4 18/6 18/13 18/15	204/14 205/15 207/23 208/3 209/7
82/13 82/17 82/24 85/12 87/4 87/7	18/18	she'll [2] 26/17 26/18
87/16 88/23 89/16 91/16 95/18 95/19	send [6] 12/1 158/4 158/5 177/3 201/9	she's [3] 95/1 98/18 100/17
95/21 95/24 96/3 96/18 96/24 97/23	201/20	sheet [1] 139/13
103/1 110/17 110/20 111/3 111/6	senior [4] 139/24 143/21 173/3 173/6	shortly [2] 183/23 183/25
119/18 120/25 125/2 135/14 136/9	sense [13] 19/3 53/15 55/22 60/25	shot [5] 158/2 201/1 201/9 201/15
137/5 138/7 153/2 163/16 164/12	70/10 101/10 106/2 107/6 109/2 112/2	201/19
166/3 166/17 166/23 167/5 167/7	139/18 140/8 160/12	shots [1] 202/13
168/13 171/23 172/25 173/22 180/13	sensitive [1] 194/12	should [17] 19/6 41/24 67/10 104/15
180/23 181/3 181/7 181/25 185/16	sentences [1] 154/23	104/21 104/22 105/2 108/7 108/9
186/10 190/1 204/2 209/22 215/19	separate [6] 47/22 60/8 77/20 143/17	108/20 109/7 120/10 133/6 166/1
Schunn [17] 90/25 91/3 102/14 102/19	168/21 211/13	191/23 192/12 211/16
103/2 103/6 107/7 107/8 107/9 107/10	separately [2] 77/19 78/4	shoulder [1] 206/1
117/15 133/16 146/20 151/21 153/6	series [1] 43/22	show [8] 13/12 62/9 66/24 71/8 121/2
154/9 199/10	serious [1] 5/13	135/8 168/20 200/20
science [4] 124/9 124/20 144/16	servants [2] 137/13 138/9	showed [1] 143/15
144/19	serve [2] 13/4 190/22	showing [3] 144/6 184/3 192/10
scope [1] 161/19	served [4] 21/15 22/12 174/18 211/2	shown [1] 38/14
scores [5] 171/9 171/13 171/17 171/20	service [6] 17/22 17/24 82/15 85/5	shows [1] 160/11
171/23	180/3 180/5	side [6] 27/17 75/17 89/12 168/25
scoring [1] 210/18	services [13] 28/3 28/11 28/24 33/12	173/19 173/20
screen [7] 131/16 158/2 201/1 201/8	40/7 45/6 45/9 45/18 149/7 154/24	sides [1] 187/10
201/15 201/19 202/13	180/12 189/11 214/20	signature [2] 63/12 63/14
screening [1] 149/10	serving [4] 167/18 170/21 180/10	significant [1] 173/1
scroll [7] 26/18 26/18 38/23 157/20	185/16	signing [1] 3/4
166/7 191/13 192/9	session [1] 66/23	silo [1] 41/3
scrolled [2] 64/11 121/23	sessions [1] 67/1	similar [1] 176/7
scrolling [2] 26/16 121/21	set [6] 11/12 110/18 155/16 157/5	simple [4] 25/9 25/9 34/13 215/25
search [4] 4/13 131/19 134/24 211/23	187/9 201/23	since [9] 6/22 14/18 15/4 56/10 92/7
searches [1] 134/16	sets [1] 53/16	92/8 151/7 171/14 215/20
second [23] 2/9 5/14 26/8 27/7 29/16	setting [1] 124/21	single [6] 12/15 23/14 31/14 50/2 50/4
29/22 51/12 75/15 81/10 83/8 98/17	several [8] 45/9 64/9 98/19 99/4 161/18	66/22
101/24 112/7 121/3 127/21 131/18	179/21 202/1 210/21	sister [1] 95/1
134/4 141/15 144/9 148/24 152/6	share [4] 131/16 134/5 165/23 172/13	sit [1] 65/22



S	89/14 110/25 113/2 114/12 122/11 159/1 160/3 160/3 178/14 206/15 specifically [16] 37/7 39/19 49/2 49/7 64/24 67/23 80/19 119/8 129/13 134/18 146/16 148/17 203/2 207/21 208/11 210/1 specifics [7] 41/19 53/18 73/21 86/8 96/15 97/5 98/4 speeding [3] 126/1 126/7 127/18 Spencer [13] 72/3 72/4 129/4 129/4 129/5 129/14 129/19 129/25 147/7 149/24 150/10 165/4 165/5 spend [7] 35/10 35/24 42/7 128/17 182/1 187/16 187/18 spending [4] 136/12 182/4 186/9 187/22 spent [3] 84/25 181/19 181/20 spoken [1] 36/13 spot [2] 127/10 127/11 spring [29] 14/6 29/10 29/20 30/21 33/16 39/9 43/15 43/21 44/5 45/14 55/23 58/3 58/6 64/25 74/18 77/16 78/14 80/12 82/25 85/5 88/5 88/16 94/9 97/21 102/10 164/15 182/18 186/11 189/3 Springer [2] 174/13 200/7 squeaky [1] 212/5 staff [15] 6/21 8/3 8/13 14/8 22/18 22/19 23/16 26/22 28/12 28/22 53/12 112/9 123/12 163/21 217/13 staffs [1] 28/18 stage [2] 147/3 147/19 stages [1] 23/1 stamp [1] 63/14 stamped [6] 27/11 71/21 142/5 149/4 149/15 168/22 standard [5] 62/25 115/18 211/14 211/16 211/19 standards [1] 211/13 start [3] 32/24 43/18 185/5 started [2] 44/8 139/12 starts [2] 149/5 184/5 state [39] 5/5 6/11 17/18 18/12 19/6 20/10 21/4 21/4 95/22 96/1 96/4 98/21 99/5 100/14 100/14 101/9 124/8 140/1 140/6 140/7 145/20 167/13 168/1 174/2 180/14 181/1 181/4 181/10 181/12 181/18 181/21 182/2 182/25 183/8 194/25 216/6 216/9 219/3 219/7 state's [2] 137/23 140/9 statement [1] 23/22 statements [1] 198/19 STATES [1] 1/1 statewide [2] 6/18 174/24 stayed [2] 110/4 111/8 Steiner [14] 3/11 3/12 3/12 4/2 4/3 5/4 9/19 26/16 26/19 47/7 72/22 81/8 130/11 218/14 steinerandsteiner.com [1] 3/14 steps [1] 148/24 Steve [4] 19/21 20/12 203/15 203/17 stick [1] 203/11 sticks [1] 208/12 still [12] 14/13 23/17 56/18 82/3 138/22 160/19 160/19 165/23 166/16 194/24 209/12 209/22 stop [6] 9/15 9/17 29/22 47/14 79/13 103/21 strategic [3] 75/13 75/16 106/11 strategies [2] 11/13 11/24	strategy [1] 215/21 streamline [4] 54/17 75/10 78/1 83/7 streamlined [2] 75/16 81/18 streamlining [1] 81/23 Street [1] 3/13 strike [2] 101/23 151/12 structure [3] 4/10 4/16 61/9 student [3] 22/2 125/17 154/24 students [17] 11/13 13/4 75/23 82/15 106/11 110/15 123/12 124/23 179/23 180/4 180/6 180/10 190/22 190/23 209/10 211/17 215/17 studies [5] 61/8 144/13 144/18 145/8 145/17 study [1] 61/11 stuff [1] 205/14 style [1] 80/15 subcontractors [1] 217/25 subject [2] 170/18 175/18 submit [1] 181/17 submitted [2] 7/2 181/20 submitting [1] 115/6 subtotal [1] 191/18 such [8] 25/25 28/22 32/3 34/10 59/15 59/16 73/24 73/25 sued [1] 179/4 Suite [2] 2/9 3/23 summer [2] 56/10 182/12 super [2] 79/7 89/16 superfluous [2] 31/24 147/18 superintendent [24] 30/6 37/24 54/9 59/2 60/4 60/10 61/3 61/23 73/10 74/18 75/8 79/10 79/10 81/21 81/23 87/19 87/25 88/22 91/7 103/8 104/23 163/6 189/18 199/8 superintendent's [1] 105/17 superintendents [31] 32/4 54/24 55/2 55/6 55/13 56/2 56/3 58/7 58/20 59/4 59/9 60/13 61/10 73/16 73/19 80/12 80/16 81/16 84/5 84/12 84/15 101/23 102/12 103/14 108/11 108/21 109/9 164/19 164/19 179/19 179/20 supervise [2] 189/19 189/23 supervised [2] 60/24 178/9 supervising [1] 211/11 supervision [12] 54/18 54/22 60/18 75/14 75/18 76/1 76/3 76/5 78/12 110/17 166/20 167/7 supervisor [7] 75/25 82/18 82/21 107/3 154/20 154/23 154/25 supervisors [4] 60/23 60/24 78/4 78/22 supervisory [2] 211/6 211/8 support [20] 76/5 81/12 110/13 111/1 111/2 111/5 166/6 166/15 166/21 167/1 169/12 178/19 204/6 204/7 204/16 206/22 207/4 207/10 209/10 209/22 supported [1] 110/20 supporting [1] 207/6 supports [1] 166/10 supposing [1] 11/4 sure [71] 5/7 7/10 8/18 9/10 18/20 19/13 19/17 28/1 30/16 32/20 43/14 49/20 59/3 60/7 67/13 68/12 68/22 69/2 70/21 71/25 81/8 82/14 89/13 90/10 91/5 94/5 95/8 95/12 95/14 100/24 101/4 101/7 105/6 115/13 115/17 115/20 123/24 124/17 127/7 128/18 129/20 129/25 130/1 132/17 132/18 137/19 138/24 139/22 140/14
---	--	--

S  
sure... [22] 146/6 146/17 150/17  
150/20 155/16 157/13 157/17 161/17  
165/3 168/19 170/13 174/3 175/25  
177/12 195/10 195/25 199/15 201/3  
204/24 205/7 207/11 209/19  
surprise [3] 68/8 68/12 138/12  
surprised [3] 137/21 138/2 177/5  
suspect [2] 177/20 178/6  
suspended [1] 132/20  
suspicion [1] 172/11  
switched [1] 6/16  
sworn [1] 5/3  
synonymous [2] 144/22 144/24  
system [14] 27/14 44/11 93/4 121/19  
122/3 124/20 141/18 155/12 155/12  
155/14 155/23 155/24 198/7 215/18

T  
T.C [3] 92/15 92/17 92/18  
tail [2] 62/22 216/11  
take [22] 15/17 33/4 41/3 68/16 68/17  
70/24 72/24 73/3 73/4 73/5 96/4 97/23  
100/19 116/3 116/9 160/11 183/18  
191/5 194/14 200/25 212/13 215/22  
taken [4] 3/1 44/14 48/3 48/25  
takes [2] 141/22 187/16  
talent [2] 28/3 28/10  
talk [25] 16/23 32/1 43/16 46/7 46/11  
46/12 46/19 65/16 65/21 66/8 81/16  
83/5 92/17 92/20 92/21 94/22 101/11  
107/7 128/25 129/14 129/19 129/21  
192/21 207/19 207/24  
talked [22] 7/11 8/4 16/10 16/14 16/18  
17/9 17/12 17/14 37/8 54/13 57/8  
65/18 81/24 82/11 92/11 120/12  
120/13 129/17 129/17 166/19 204/5  
206/21  
talking [32] 31/22 46/6 52/4 76/19  
82/17 82/19 91/3 100/1 100/16 100/17  
105/10 105/11 106/3 108/14 108/18  
109/3 110/25 112/10 112/22 124/4  
124/12 148/4 149/11 167/6 169/9  
175/18 186/3 186/20 205/14 206/5  
208/25 214/12  
talks [1] 100/20  
tangent [2] 198/1 198/3  
targeted [2] 42/21 184/21  
task [2] 161/1 161/8  
taught [2] 77/9 93/7  
tax [11] 187/20 195/1 195/18 195/19  
196/3 197/5 197/11 213/13 213/14  
213/21 213/21  
taxed [1] 160/25  
taxes [12] 187/14 194/17 194/17  
194/23 195/2 195/11 195/14 197/8  
197/13 198/4 198/15 213/9  
teach [4] 76/4 76/8 76/14 77/13  
teacher [9] 79/5 79/6 89/11 89/21  
93/25 163/7 174/10 178/6 189/15  
teachers [7] 82/8 85/3 90/23 173/21  
173/21 177/18 178/4  
teaching [7] 177/8 177/9 177/10 177/16  
177/17 178/3 178/5  
team [7] 28/1 53/25 160/18 164/14  
184/17 184/18 216/8  
Teams [1] 67/4  
technical [3] 133/12 134/23 164/6  
technically [3] 89/15 89/17 142/20  
technology [2] 121/7 216/2

telephone [1] 85/14  
tell [54] 6/2 7/13 9/24 10/23 11/8 42/23  
43/2 43/5 43/6 45/13 45/22 48/1 59/6  
65/3 70/3 70/7 70/11 74/10 75/6 80/19  
81/22 99/16 100/8 101/14 104/6 110/6  
117/1 117/23 118/15 119/19 120/17  
120/20 129/5 129/9 146/3 148/6  
148/10 148/18 149/24 150/21 152/21  
153/2 154/4 154/8 156/2 165/25  
170/10 171/16 180/5 185/4 200/5  
205/15 206/10 209/4  
telling [11] 42/6 44/16 44/21 50/22 60/3  
78/25 88/12 90/12 111/23 112/25  
130/1  
tells [1] 99/18  
TENNESSEE [21] 1/1 1/7 1/13 1/20  
2/9 3/2 6/19 18/12 118/11 124/8  
137/23 144/1 145/19 181/1 181/4  
181/10 181/12 195/9 219/3 219/7  
219/19  
tenured [2] 163/7 178/6  
term [12] 24/3 27/25 55/3 94/7 94/12  
94/13 130/21 133/12 145/1 164/13  
178/14 178/14  
terms [5] 25/23 37/8 78/21 163/17  
189/5  
terrible [1] 9/16  
testified [3] 9/1 52/16 52/21  
testify [1] 155/21  
testimony [1] 73/14  
testing [3] 214/15 214/19 214/22  
text [1] 36/25  
than [27] 33/7 35/7 47/4 47/18 64/6  
80/11 82/8 125/14 125/16 125/18  
126/14 129/15 139/9 158/12 168/8  
177/8 187/24 190/6 194/24 195/12  
195/12 195/21 196/3 196/4 196/20  
197/1 217/22  
thank [10] 10/11 47/8 148/20 151/24  
155/3 201/19 202/7 210/8 214/9  
218/20  
thankful [1] 198/11  
that [1192]  
that's [163] 5/9 8/17 8/18 9/8 10/7  
10/17 12/6 13/15 14/1 14/24 19/23  
20/22 21/2 23/9 24/6 26/16 26/25  
26/25 28/21 28/22 29/2 30/18 33/25  
34/4 35/25 36/8 38/9 39/18 41/17  
41/18 42/22 43/3 43/3 44/10 44/14  
46/6 46/9 47/11 49/20 49/22 51/1  
55/10 57/6 57/19 57/20 58/13 58/15  
58/18 60/1 64/18 66/1 67/3 67/8 68/22  
69/6 70/14 70/24 72/25 73/17 74/20  
75/3 76/10 76/16 77/8 78/16 79/21  
80/9 81/13 83/8 85/2 86/24 94/7 95/5  
95/14 98/20 98/21 99/17 99/23 100/3  
100/7 100/7 101/19 106/1 109/6  
109/14 109/20 109/21 110/3 110/5  
111/7 112/13 113/25 114/24 121/4  
124/9 125/1 125/10 125/14 125/18  
126/24 128/17 130/16 142/20 142/22  
144/2 144/6 147/16 148/2 149/10  
149/23 150/25 153/19 160/19 160/23  
161/2 161/25 162/23 162/24 162/24  
163/3 163/4 164/5 165/13 166/4  
166/21 167/17 169/13 169/15 173/24  
179/16 181/5 181/9 182/5 182/9  
182/18 185/10 185/19 186/15 188/7  
188/11 191/20 191/24 193/11 197/20  
200/12 202/2 203/23 205/5 205/14

206/9 212/12 212/18 214/2 214/5  
214/5 214/12 216/12 216/20 217/5  
217/10 217/18 218/9 218/12  
their [40] 20/18 28/25 29/19 29/21  
30/23 31/16 39/21 48/11 66/23 67/9  
69/3 70/13 70/14 74/3 75/24 77/14  
77/16 81/17 106/8 107/2 108/1 114/13  
114/17 118/6 122/14 122/14 133/10  
133/17 133/19 137/14 172/13 179/12  
183/1 198/15 206/24 207/10 207/10  
211/12 211/24 211/25  
them [61] 11/8 20/22 23/15 27/12 29/4  
29/4 29/11 30/5 41/5 43/6 49/10 58/21  
60/25 65/21 65/22 66/18 67/23 68/7  
69/21 70/12 70/22 77/12 80/20 81/20  
82/5 94/15 94/15 94/17 95/23 96/2  
99/1 99/4 99/7 100/22 101/14 104/25  
106/4 106/8 107/1 107/4 110/18 114/9  
114/13 114/16 116/3 127/2 127/24  
128/16 128/17 128/23 139/6 140/17  
150/4 150/5 155/10 160/14 177/3  
177/3 194/5 215/3 215/20  
themselves [1] 108/15  
then [104] 6/10 6/14 6/17 6/20 6/22  
7/11 7/18 7/24 10/22 11/6 11/7 11/14  
12/1 12/5 12/8 13/3 13/9 22/25 29/3  
33/21 34/1 35/12 44/16 45/25 48/18  
50/22 51/21 55/5 55/12 57/13 58/6  
60/23 68/5 70/16 73/8 74/23 77/3  
77/24 78/3 78/10 78/21 79/11 79/13  
89/25 95/22 96/1 97/23 97/23 101/13  
107/4 110/18 120/15 124/18 124/18  
126/21 127/8 133/11 133/13 138/16  
138/24 139/16 139/17 147/10 147/12  
149/20 151/2 151/18 153/15 155/16  
155/17 157/6 157/6 158/23 160/4  
164/21 164/22 167/12 169/1 169/2  
173/4 173/7 173/7 177/3 181/18 182/1  
185/4 187/13 187/18 187/24 189/12  
191/1 191/17 195/1 195/18 196/19  
202/6 204/18 204/20 214/1 214/10  
215/21 216/5 216/6 216/8  
there [124] 8/5 11/18 11/18 11/19  
16/22 19/3 19/5 20/19 20/21 23/2  
24/16 25/16 27/3 30/3 30/4 30/10  
31/15 31/17 32/19 32/25 33/19 34/2  
34/11 37/5 39/20 39/23 43/3 43/17  
43/22 44/7 44/24 45/8 45/11 46/14  
47/9 47/11 47/12 49/9 49/22 50/23  
51/17 54/20 55/7 55/8 55/10 55/19  
57/16 59/7 60/8 60/17 61/1 67/24 68/1  
68/9 69/3 69/6 79/4 79/13 82/14 85/10  
85/17 96/3 99/2 99/15 100/9 102/4  
104/25 110/19 111/2 111/10 111/11  
113/21 114/14 116/2 117/8 123/6  
124/17 128/5 131/24 135/20 135/23  
135/25 136/3 136/10 139/12 139/17  
141/1 142/3 143/20 144/6 155/18  
158/17 161/6 161/18 164/11 164/19  
166/9 166/16 171/22 172/21 179/14  
179/21 181/15 182/16 184/8 187/10  
187/24 188/1 189/13 194/6 194/8  
197/13 197/16 199/16 199/17 201/4  
208/1 209/24 210/15 212/12 212/21  
213/9 216/19 216/22  
there's [25] 9/14 28/9 44/18 44/19 45/6  
46/25 54/5 64/17 64/18 68/6 69/8  
73/22 74/23 75/1 81/2 86/5 100/14  
104/9 112/24 116/2 141/13 166/21  
185/6 208/12 211/13

T		
therefore [1] 107/3	44/4 44/24 45/20 45/23 46/14 46/24	throughout [1] 36/17
these [30] 13/12 25/22 27/1 45/15	47/8 47/24 48/1 48/22 49/14 49/15	tied [1] 143/2
47/18 47/22 48/13 48/24 66/8 67/5	49/15 49/25 50/16 51/9 51/9 51/14	time [79] 5/9 8/23 9/17 14/12 18/14
67/16 69/22 70/2 70/6 71/6 86/4	51/17 52/1 53/21 57/10 58/11 61/20	20/11 22/10 22/12 23/2 23/4 26/22
101/22 104/7 105/22 108/8 108/10	62/11 62/12 62/14 62/22 62/23 62/24	33/9 34/12 34/23 34/25 37/17 46/15
109/8 117/10 123/4 131/21 165/16	63/19 63/22 64/16 64/20 64/21 64/24	49/14 65/21 67/4 69/20 70/20 73/2
184/23 190/3 192/8 193/22	65/3 65/7 67/3 69/6 70/17 70/17 71/1	76/20 79/9 83/5 85/1 86/13 88/14
they [141] 6/12 12/8 13/2 19/15 21/12	71/16 71/18 71/22 71/24 72/8 72/9	88/15 88/23 88/25 89/1 89/19 90/6
21/14 23/2 23/6 23/6 23/8 24/9 24/23	72/16 83/18 83/24 84/12 86/12 86/13	90/12 90/14 92/9 92/12 93/19 94/5
24/25 25/1 25/2 28/18 28/25 29/6	86/14 88/6 89/25 96/16 98/14 99/19	98/19 99/8 109/5 119/17 129/19
29/11 29/20 30/22 30/25 31/11 31/15	99/22 105/14 105/15 106/15 109/4	132/11 133/1 133/5 133/21 138/23
35/10 35/23 37/7 37/8 37/9 38/9 42/8	111/1 112/5 121/4 121/11 121/13	139/3 143/7 147/24 154/12 165/1
42/13 42/14 42/20 48/12 48/12 53/1	122/8 123/24 125/21 126/13 127/17	166/10 171/15 172/19 176/23 179/22
55/9 56/4 56/15 56/16 58/21 58/21	127/20 128/6 128/9 129/7 131/9	183/13 183/14 183/15 184/1 186/20
62/10 62/11 66/10 66/11 66/24 66/24	131/18 133/7 133/17 134/5 134/19	186/24 187/3 188/8 188/9 190/8 192/3
67/13 67/15 68/14 70/4 70/7 70/14	136/18 137/3 137/17 138/23 139/13	194/8 194/8 200/11 207/25 218/18
70/23 70/24 73/25 76/4 76/8 76/8	141/3 141/13 141/25 142/2 142/5	218/18 218/18
76/14 77/3 77/9 77/12 77/13 77/22	142/23 144/8 145/14 146/4 147/8	timeframe [1] 123/10
80/11 80/14 84/7 88/22 99/5 99/8	149/1 149/1 149/8 149/15 150/8	timeframes [1] 143/22
99/10 100/24 101/1 102/6 107/19	152/11 157/2 157/25 160/10 165/23	timeline [2] 97/22 111/1
107/25 110/4 110/7 110/23 111/2	165/24 166/1 166/2 166/12 166/13	times [7] 9/3 48/20 165/3 165/4 174/9
114/7 114/10 114/14 115/6 116/11	166/19 167/25 168/16 168/19 168/22	192/4 194/6
116/12 122/4 122/15 122/20 122/22	169/13 169/13 179/11 180/3 183/21	timing [2] 38/10 183/19
122/25 123/8 125/25 131/22 133/18	184/2 184/14 184/23 184/25 185/21	title [6] 59/19 59/24 93/4 139/11 152/23
139/11 146/6 146/17 151/7 154/24	186/1 186/2 186/3 186/4 186/8 189/21	161/18
171/2 172/9 172/11 172/11 173/2	189/25 191/8 192/10 192/10 194/16	TN [3] 3/13 3/19 3/24
173/8 174/2 176/25 177/1 177/1	195/16 196/7 197/25 203/1 204/17	today [5] 9/23 50/23 79/17 83/25
181/14 181/22 182/1 182/24 183/2	204/20 205/8 206/15 207/9 210/9	188/17
183/9 187/8 187/24 194/2 194/4	210/11 213/17 214/18 215/8 217/6	together [5] 39/12 64/9 138/10 139/3
194/24 197/1 197/19 199/23 206/2	217/8 217/13 217/16 217/16 217/25	161/3
206/18 206/19 209/10 209/16 209/22	218/21 219/16	told [26] 16/9 37/15 42/20 66/7 67/5
210/14 211/25 212/6 212/6 212/10	those [105] 11/14 11/15 19/16 21/8	82/2 92/14 98/13 101/22 104/15 105/3
212/10 214/22 215/4	21/9 23/10 23/17 29/3 32/18 37/25	108/8 108/10 108/20 109/8 120/25
they're [13] 25/17 49/10 95/23 101/25	38/4 38/8 38/12 38/12 41/22 43/23	146/4 146/10 150/2 150/23 179/3
102/7 105/19 134/14 147/15 162/2	45/11 49/13 51/4 51/7 53/18 60/4 60/8	199/11 200/5 205/10 212/17 213/12
185/16 206/24 209/8 211/3	60/12 61/1 61/18 63/1 64/12 65/14	too [10] 13/18 71/8 114/1 122/23
they've [2] 95/20 115/11	65/18 67/14 69/17 70/19 73/15 74/11	143/20 161/20 168/6 179/25 185/9
thing [13] 9/14 12/16 13/15 28/21 41/16	74/17 74/23 75/4 75/9 75/19 78/2 78/7	192/6
48/24 113/13 127/14 128/4 144/12	80/2 80/25 96/4 104/10 107/18 108/4	took [6] 103/23 137/11 176/19 182/25
157/1 186/24 201/22	110/1 113/15 114/1 115/24 123/14	183/2 191/21
things [23] 12/17 33/10 38/12 38/12	124/22 126/4 132/23 133/9 137/12	top [16] 6/12 6/15 38/22 64/14 86/2
45/20 49/13 51/23 81/24 82/2 82/12	139/20 143/16 143/22 144/21 144/23	86/11 121/5 121/14 131/24 141/19
112/6 123/6 133/9 145/12 161/19	144/24 145/12 145/13 153/13 153/15	143/5 192/13 196/13 211/15 211/20
161/19 161/20 162/5 176/18 198/6	156/16 159/11 162/5 163/25 164/4	212/6
207/8 214/22 214/25	166/11 166/18 166/18 167/8 171/7	total [8] 12/8 43/12 46/25 50/24 159/23
think [86] 7/18 10/6 10/7 11/8 13/7	173/20 175/5 175/6 175/9 179/20	193/8 195/25 217/20
18/21 18/24 23/24 42/17 43/14 49/3	181/21 182/11 182/23 183/23 186/20	totality [6] 42/17 44/14 45/3 46/9 48/25
56/18 70/8 72/4 80/22 83/18 86/10	186/23 190/24 190/25 199/6 199/13	194/15
88/11 94/6 94/13 96/10 96/13 100/14	202/12 202/12 202/13 204/15 208/20	toward [1] 77/2
102/6 104/6 104/15 105/2 105/20	209/11 210/19 211/11 214/25 216/10	TPI [1] 147/13
105/21 106/17 107/12 107/15 108/7	218/17 218/17	traffic [3] 125/23 126/8 126/14
108/9 108/19 109/7 109/20 110/9	though [15] 12/10 23/16 24/7 27/2 57/4	trained [3] 175/6 175/22 175/24
111/10 111/19 112/22 114/24 116/15	95/18 125/10 134/22 142/20 155/18	transcript [2] 68/9 219/10
117/25 120/10 122/15 123/14 123/23	190/15 195/15 197/14 197/15 216/10	transfer [3] 47/10 163/25 164/2
124/22 125/1 127/23 133/6 136/10	thought [6] 16/4 20/10 73/2 116/16	transition [1] 138/25
138/19 142/2 146/16 151/1 155/4	119/3 199/23	transitions [1] 137/12
157/5 162/13 164/18 165/24 167/23	thoughts [2] 70/13 172/13	transmitting [1] 155/19
172/16 174/17 178/4 179/11 182/15	three [16] 101/22 102/11 103/13 104/6	transparent [1] 69/5
185/7 185/17 186/19 187/13 189/10	104/7 104/10 105/3 105/22 108/8	Trauger [1] 1/6
190/1 190/4 193/20 201/5 203/14	108/10 108/20 109/8 115/23 115/24	Treasury [1] 6/10
203/18 206/7 206/25 211/1 211/16	151/21 153/8	tremendously [3] 194/18 198/9 198/16
212/18 213/17 215/24	through [45] 11/3 12/7 13/8 16/2 33/12	tried [3] 96/18 96/23 215/22
thinking [9] 15/20 15/24 15/25 55/4	47/20 47/23 48/2 50/14 58/10 61/17	true [8] 24/15 24/23 138/1 153/24
120/13 128/15 146/25 199/18 204/18	64/9 64/11 65/16 68/14 75/11 76/21	153/25 191/1 198/15 219/10
this [195] 5/10 9/20 11/8 12/22 13/5	76/23 115/16 119/12 119/15 119/16	trustee's [1] 213/13
18/3 18/25 20/20 22/22 23/20 26/7	128/13 128/19 133/8 135/15 135/20	try [15] 33/8 44/23 45/3 50/5 50/14
26/11 27/1 27/5 27/8 27/16 27/25 29/5	136/4 138/17 142/8 143/5 147/10	80/24 83/5 109/6 123/12 133/8 138/10
29/22 32/8 36/17 37/15 38/13 38/22	154/24 182/15 185/3 185/4 185/5	176/13 180/11 194/5 207/24
39/5 39/11 40/6 40/7 40/7 41/18 43/13	189/3 190/12 190/14 191/8 202/1	trying [53] 8/21 13/1 17/7 19/3 19/5
	204/21 209/8 209/14	20/20 21/2 21/22 24/11 44/22 54/17



<p>T</p> <p>trying... [42] 54/19 57/20 77/25 80/3 80/22 81/6 81/8 82/11 82/13 85/7 86/10 87/15 88/10 106/14 110/9 110/12 114/11 118/4 119/7 130/23 140/16 140/17 146/16 146/17 156/22 162/3 167/22 172/21 174/16 177/21 184/20 187/2 192/8 204/3 204/10 206/7 206/9 206/10 207/21 212/1 212/18 215/16</p> <p>turn [1] 157/17</p> <p>turned [1] 181/3</p> <p>Turner [19] 90/25 91/3 102/14 102/20 103/3 103/6 107/7 107/8 107/9 107/10 115/25 117/15 133/16 146/20 151/7 151/21 153/6 154/9 199/10</p> <p>turnover [1] 191/18</p> <p>tweaks [1] 111/10</p> <p>two [24] 6/19 38/12 62/9 80/25 86/11 96/5 103/19 110/6 111/4 112/22 122/16 122/20 135/25 139/9 140/23 143/16 148/24 154/25 155/10 159/9 166/9 166/18 187/10 211/13</p> <p>type [8] 9/5 17/1 34/14 36/20 36/21 64/6 120/14 161/16</p> <p>typed [1] 63/24</p> <p>types [3] 59/11 115/19 133/9</p> <p>typical [2] 62/23 68/13</p> <p>typically [5] 13/5 13/8 23/23 113/19 148/22</p>	<p>universities [1] 124/18</p> <p>University [3] 6/6 124/9 145/20</p> <p>unknown [1] 34/25</p> <p>unlawful [1] 133/4</p> <p>unnecessary [1] 81/19</p> <p>until [5] 10/3 14/20 121/7 147/15 151/20</p> <p>untwine [1] 145/12</p> <p>unusual [1] 186/21</p> <p>up [77] 6/9 8/24 11/5 25/11 31/20 31/21 31/21 38/23 43/23 45/10 47/12 49/15 51/7 56/20 57/7 64/16 66/24 77/20 96/10 97/24 98/17 114/21 115/6 115/15 118/4 125/20 130/12 131/23 133/21 135/2 137/14 137/25 139/1 141/9 141/14 141/22 152/6 155/3 155/16 156/3 157/5 157/16 157/20 158/25 160/21 161/20 161/21 162/5 165/23 166/8 170/18 171/23 173/9 176/24 177/1 185/5 187/12 191/7 191/13 193/18 194/23 195/14 195/17 195/20 196/19 198/8 198/15 200/20 200/24 201/7 201/23 204/20 207/14 207/25 213/10 214/6 218/2</p> <p>upon [1] 21/3</p> <p>upset [1] 171/20</p> <p>us [10] 26/18 31/17 35/23 45/1 71/5 128/5 177/13 181/15 190/22 200/20</p> <p>use [6] 115/18 134/13 163/8 164/13 191/4 216/20</p> <p>used [8] 18/4 27/2 41/21 141/11 178/13 178/19 180/11 182/12</p> <p>uses [3] 28/1 63/14 145/2</p> <p>using [2] 164/18 178/15</p> <p>usually [3] 116/9 159/16 175/18</p>	<p>voice [1] 152/7</p> <p>volunteered [1] 22/1</p> <p>vote [3] 70/24 99/21 101/13</p> <p>voting [1] 99/19</p>
<p>U</p> <p>U.S [2] 118/8 118/12</p> <p>uh [27] 9/13 9/15 55/25 77/15 84/6 92/19 94/18 98/25 104/19 104/24 105/1 109/25 118/3 130/20 135/13 137/1 159/22 163/2 163/10 163/19 165/19 172/19 203/10 207/18 210/6 213/5 216/24</p> <p>uh-huh [27] 9/13 9/15 55/25 77/15 84/6 92/19 94/18 98/25 104/19 104/24 105/1 109/25 118/3 130/20 135/13 137/1 159/22 163/2 163/10 163/19 165/19 172/19 203/10 207/18 210/6 213/5 216/24</p> <p>ultimate [1] 75/25</p> <p>ultimately [2] 12/6 200/8</p> <p>uncle [1] 5/12</p> <p>under [17] 13/25 23/4 40/7 50/22 53/25 54/1 77/19 78/3 89/11 89/22 102/1 102/7 137/23 166/11 167/4 191/14 194/6</p> <p>underfunded [1] 180/15</p> <p>underfunding [1] 44/25</p> <p>undergrad [2] 6/5 6/6</p> <p>undergraduate [1] 124/12</p> <p>understand [15] 9/23 24/11 49/3 57/21 60/7 104/20 105/6 109/5 109/13 109/16 109/18 128/4 139/2 173/25 205/7</p> <p>understanding [11] 23/20 25/14 37/12 70/19 73/13 117/2 141/18 161/15 163/7 174/5 216/3</p> <p>unemployment [1] 140/5</p> <p>unexpectedly [1] 138/22</p> <p>unfilled [3] 192/21 192/25 193/21</p> <p>unfortunately [4] 33/10 161/19 180/8 194/7</p> <p>unified [1] 79/21</p> <p>UNITED [1] 1/1</p>	<p>V</p> <p>vacancies [6] 190/9 190/11 190/14 191/3 192/20 193/24</p> <p>vacancy [2] 55/10 191/18</p> <p>vacant [14] 14/4 14/17 55/7 55/8 55/15 56/4 56/5 56/9 79/11 84/13 84/17 84/23 146/18 193/15</p> <p>vague [4] 206/3 207/3 207/5 208/5</p> <p>vaguely [1] 176/20</p> <p>valuable [1] 180/13</p> <p>value [2] 14/25 198/12</p> <p>values [2] 197/16 197/17</p> <p>Vanessa [1] 92/6</p> <p>variance [1] 81/5</p> <p>variety [10] 12/16 22/9 29/6 30/4 38/1 44/12 59/13 77/25 79/4 211/21</p> <p>various [3] 11/11 22/19 165/3</p> <p>varying [1] 183/8</p> <p>vehicle [1] 127/14</p> <p>vendor [4] 45/19 147/12 216/18 216/21</p> <p>vendors [1] 216/23</p> <p>very [29] 21/12 30/16 36/8 36/10 43/10 51/16 62/6 62/19 68/10 82/13 82/14 121/5 138/17 140/15 148/21 162/8 176/7 176/7 178/14 189/13 190/21 191/5 191/22 194/11 194/12 195/10 206/19 206/20 215/25</p> <p>VI [2] 93/4 152/23</p> <p>Via [1] 219/9</p> <p>violating [1] 132/13</p> <p>violation [2] 126/8 126/15</p> <p>violations [1] 125/23</p> <p>virtual [1] 76/20</p> <p>vision [3] 8/5 14/24 53/16</p>	<p>W</p> <p>wait [9] 16/18 127/17 127/17 138/4 151/19 151/25 166/17 166/17 166/17</p> <p>waived [1] 3/4</p> <p>walk [1] 191/7</p> <p>want [67] 10/5 11/2 11/7 11/12 12/13 16/1 17/1 22/5 26/25 27/5 27/16 30/16 39/15 40/5 40/6 43/14 44/4 45/22 46/7 46/11 49/2 49/6 62/10 63/8 71/7 75/22 76/7 81/8 81/11 81/11 89/13 93/15 105/13 105/14 105/14 106/20 106/23 106/25 107/25 110/13 114/10 114/19 117/25 120/14 121/2 123/25 125/25 127/16 130/14 130/18 131/21 134/22 146/12 154/13 162/21 165/21 166/1 169/20 180/9 180/9 185/21 194/16 205/7 206/17 206/18 207/7 212/10</p> <p>wanted [17] 17/16 17/18 29/5 67/13 69/5 75/10 75/12 77/11 77/19 116/16 135/2 146/14 149/21 151/15 205/3 207/15 209/23</p> <p>wants [3] 104/7 104/9 104/10</p> <p>was [416]</p> <p>wasn't [33] 7/13 19/2 30/9 45/17 61/2 67/17 88/4 88/14 88/25 89/23 90/16 106/21 111/15 111/15 111/17 111/21 113/17 140/21 143/5 145/25 156/15 164/22 164/23 179/4 193/1 193/2 194/7 203/6 205/1 206/25 208/1 211/22 214/11</p> <p>waste [1] 47/10</p> <p>watched [2] 41/4 155/22</p> <p>Waverly [2] 93/7 93/18</p> <p>way [41] 11/10 11/11 19/2 33/2 35/14 37/10 52/22 55/4 64/8 68/13 70/9 75/13 75/16 76/21 80/24 81/3 85/8 99/4 105/22 107/9 108/1 110/21 111/3 117/18 128/19 138/19 153/6 169/12 179/17 188/12 193/3 193/6 200/10 201/23 203/1 204/7 205/13 206/15 208/11 214/21 219/15</p> <p>ways [3] 11/11 161/2 204/5</p> <p>we [268]</p> <p>we'd [2] 120/14 146/7</p> <p>we'll [4] 73/3 109/6 168/21 202/12</p> <p>we're [37] 11/8 12/24 13/1 32/24 33/13 36/16 46/20 46/21 52/4 55/23 71/9 77/1 79/2 80/22 83/4 83/17 85/6 105/10 106/2 109/3 109/3 123/11 133/22 141/14 142/9 162/25 165/22 166/10 175/18 180/14 189/14 190/21 191/20 205/14 212/1 212/8 216/11</p> <p>we've [9] 11/10 42/6 42/21 54/13 57/16 59/16 76/19 116/1 165/24</p> <p>weapon [5] 126/16 126/16 126/22 128/2 133/4</p> <p>weapons [1] 123/1</p> <p>Weber [3] 92/15 92/17 92/18</p> <p>website [9] 137/24 213/13 215/1 215/5 215/11 215/25 216/1 216/2 218/11</p> <p>well [50] 5/11 7/23 8/1 17/9 34/1 35/10 38/21 42/21 46/9 50/3 54/7 54/14 54/21 55/7 65/20 76/18 80/2 95/12 96/21 101/11 112/16 115/14 118/16 120/8 147/17 148/6 148/21 159/1</p>

W		
well... [22] 161/8 164/20 172/2 174/25 177/24 180/8 182/20 183/4 190/23 191/24 192/13 192/19 193/13 195/8 203/1 205/12 206/9 206/14 209/13 212/21 213/12 214/16	156/11 158/25 159/3 159/9 164/21 174/5 174/10 175/5 175/6 175/9 175/23 181/20 183/7 183/19 185/4 186/18 186/25 187/9 191/1 193/22 195/11 195/13 195/15 195/17 195/17 197/12 199/21 200/5 200/23 203/8 204/18 205/15 206/2 206/12 206/20 207/23 209/16 210/10 211/8 217/16	why [57] 8/18 14/22 30/18 35/25 40/7 41/25 54/11 59/6 61/22 64/6 68/25 69/6 69/24 70/4 70/4 74/10 74/13 75/7 80/19 81/13 82/23 83/4 84/21 84/22 84/23 85/2 85/8 85/9 91/15 110/6 110/11 111/12 111/17 114/10 116/14 119/24 128/17 150/9 150/14 150/18 154/3 156/7 156/9 157/4 164/8 171/23 172/9 172/24 174/2 174/6 179/18 186/17 203/2 203/8 203/11 206/8 217/11
well-being [2] 205/12 206/14	where [37] 17/19 19/7 19/14 23/12 27/6 27/12 29/4 31/23 34/8 49/25 50/25 95/7 95/12 99/3 107/2 124/4 124/8 125/21 126/25 127/11 129/21 143/20 143/23 149/17 168/25 180/25 187/6 188/13 190/6 190/19 191/17 191/20 195/19 196/14 197/18 200/19 218/15	wide [1] 12/16
went [41] 6/5 6/11 6/18 47/20 47/23 54/7 95/2 110/7 113/14 147/10 157/12 166/12 166/15 187/8 188/3 189/15 194/9 194/23 195/3 195/11 195/14 195/15 195/17 195/19 195/20 196/15 196/17 196/19 198/6 198/8 204/21 207/11 207/12 208/1 214/1 214/3 214/6 214/10 216/6 216/6 216/8	WHEREUPON [11] 50/18 52/10 71/11 72/19 83/20 131/12 133/24 141/5 142/11 169/23 202/14	wife [3] 6/9 173/1 173/11
were [178] 8/18 11/23 20/15 22/6 22/16 27/2 29/10 29/14 29/19 30/1 30/4 31/7 31/15 34/23 35/8 35/10 35/12 35/15 35/21 35/22 35/23 35/25 37/6 37/25 39/23 40/2 43/17 44/7 45/11 45/18 48/5 50/24 52/2 54/16 54/17 58/7 58/11 58/19 58/20 59/7 59/9 61/22 61/23 62/11 64/11 64/18 65/14 65/23 67/18 73/8 74/22 74/22 75/8 77/25 78/4 78/22 81/15 81/17 85/3 99/2 99/15 101/1 101/22 103/6 103/10 103/13 105/8 106/14 106/16 106/23 108/14 108/18 108/24 109/12 110/1 110/12 110/16 110/19 110/20 111/5 111/25 112/6 112/8 112/9 113/16 114/4 114/6 114/7 115/24 116/11 116/12 117/4 120/25 121/24 123/6 123/7 137/7 137/16 138/23 143/22 144/15 146/7 146/16 146/17 148/4 148/7 148/18 151/7 154/20 155/21 157/3 157/8 157/9 158/24 159/1 159/7 159/10 160/10 160/18 161/11 161/18 164/18 164/21 165/16 166/9 166/18 167/5 169/9 169/16 170/25 171/2 171/9 171/17 172/9 172/12 172/20 172/22 174/21 175/9 176/8 179/20 179/21 182/24 183/9 184/21 187/2 192/10 194/24 195/16 196/9 196/10 196/14 196/24 197/1 197/16 199/7 199/8 199/12 199/21 200/2 200/6 203/18 204/18 207/20 208/5 208/20 209/12 209/22 211/13 214/12 214/22 215/14 215/16 216/19 216/22 217/11 218/17 218/17	wife's [1] 173/7	
weren't [3] 74/21 91/1 210/23	whether [85] 11/18 12/22 16/23 17/1 17/13 17/16 17/17 18/11 19/5 19/15 29/9 29/11 29/18 29/20 30/22 31/10 31/23 32/2 34/2 40/6 43/17 44/6 44/17 45/6 45/11 58/24 59/7 59/8 61/5 64/16 65/10 66/24 67/10 67/15 69/8 69/22 72/8 89/15 89/17 89/20 91/15 96/17 97/2 97/13 97/16 98/7 98/10 101/19 105/16 106/18 106/24 109/16 113/22 115/11 117/12 117/15 122/4 123/3 123/7 124/15 126/21 130/5 130/8 136/7 136/14 137/4 137/5 137/15 138/1 138/13 141/15 145/16 146/7 154/20 158/23 159/10 165/15 182/23 183/2 208/17 210/9 211/14 211/15 211/18 211/19	Wild [1] 93/1
West [1] 213/2	which [26] 14/8 21/8 23/11 35/1 38/22 39/6 40/8 60/6 70/23 77/2 82/21 84/14 88/24 116/22 120/1 122/13 127/18 178/13 178/14 181/16 187/11 191/10 193/9 207/11 208/24 212/25	will [9] 11/14 65/25 125/10 152/22 162/25 163/3 186/13 192/9 201/17
what [245]	while [8] 129/13 136/9 173/3 175/12 182/25 183/2 183/18 209/11	Williams [3] 58/5 79/25 82/25
what's [11] 25/6 76/2 92/9 100/13 121/2 136/2 144/2 167/20 168/16 186/7 193/24	whistleblower [1] 102/5	within [1] 35/23
whatever [4] 5/12 31/24 62/3 183/15	White's [3] 89/4 89/5 164/9	without [4] 34/1 50/12 127/18 159/13
wheel [1] 212/5	who [107] 14/2 14/6 16/7 19/12 22/7 22/15 22/21 25/7 25/12 26/6 28/15 28/17 30/25 30/25 37/15 40/18 55/6 56/3 56/7 56/25 57/25 58/2 60/23 61/15 63/24 64/3 65/3 71/24 75/19 75/22 76/8 77/12 77/14 78/2 78/7 78/12 79/8 79/9 79/10 79/23 80/1 82/5 82/24 87/19 88/1 88/13 89/16 90/11 91/18 92/14 92/15 92/24 93/19 93/24 96/13 97/7 104/8 110/16 113/1 113/20 113/22 113/25 115/24 119/22 123/14 128/25 129/3 129/18 138/21 147/12 147/20 150/10 150/17 150/20 151/19 154/1 155/5 156/5 160/17 160/18 164/15 164/24 164/25 165/10 166/2 166/5 167/16 168/12 168/13 170/8 170/18 173/20 179/20 184/21 190/22 194/18 198/12 203/15 204/11 204/15 207/9 208/20 209/19 210/3 210/22 211/15 212/5	witness [1] 5/2
wheelhouse [1] 110/25	Who's [1] 184/18	won [1] 6/12
when [108] 6/11 7/23 7/25 9/15 10/11 11/21 15/23 15/24 18/14 22/6 27/2 34/9 39/4 39/11 39/20 39/23 40/17 51/23 58/19 62/11 80/22 81/15 87/23 87/24 88/3 88/4 88/10 88/12 90/3 90/10 91/8 92/8 92/10 92/11 93/10 94/3 97/9 98/6 98/18 102/5 109/6 114/3 114/4 114/22 115/21 117/22 122/6 123/5 127/23 128/6 128/9 132/5 132/7 136/5 137/10 137/15 139/4 139/8 142/2 142/23 144/8 146/1 148/4 152/3 153/5 153/21 154/19 155/4	whole [10] 9/22 61/21 77/23 82/10 141/22 143/7 164/23 192/25 193/21 201/22	wonder [4] 204/19 207/9 207/9 209/13
	whom [1] 163/13	Woodland [1] 3/13
	whose [2] 93/12 108/11	word [3] 25/17 153/24 153/25
		work [39] 6/7 6/8 11/9 14/13 16/12 17/19 18/4 18/6 18/11 33/3 53/20 53/23 54/8 54/21 87/16 96/18 96/24 118/7 119/13 119/16 120/2 122/3 136/5 137/8 138/6 138/11 138/14 138/17 139/3 139/6 148/15 162/6 162/9 162/11 162/19 163/13 178/18 206/18 206/20
		worked [22] 6/10 18/15 21/25 53/24 54/1 54/3 54/6 87/4 119/3 129/22 135/14 135/20 135/23 135/25 137/17 138/20 139/4 140/25 142/16 143/25 215/21 217/25
		worker [1] 180/10
		workers [1] 185/15
		workers' [1] 140/5
		workforce [5] 139/25 140/1 140/7 140/9 140/12
		working [8] 118/8 118/13 136/9 136/18 137/13 140/14 140/20 140/24
		workings [1] 173/25
		workplace [1] 143/21
		works [10] 10/23 17/20 33/20 33/25 42/16 44/11 121/18 135/17 147/8 147/13
		worth [1] 200/1
		would [319]
		wouldn't [31] 8/20 17/7 18/16 31/12 31/13 34/13 41/22 42/2 50/13 67/11 68/4 72/6 72/11 73/21 79/1 91/24 97/25 102/23 113/23 114/18 130/11 133/20 138/15 139/19 163/8 178/7 179/13 187/25 199/25 203/21 211/11
		writing [2] 161/11 161/16
		written [1] 100/8
		wrong [6] 23/21 85/22 85/24 86/6 86/9 177/9
		X
		X-ing [1] 75/6
		Y
		yeah [29] 6/4 8/10 8/14 10/1 66/11 77/18 80/22 85/2 89/4 91/21 99/17 107/11 135/24 142/25 143/4 144/11

Y  
yeah... [13] 148/2 157/15 157/24 158/5  
161/9 161/9 201/5 202/25 204/24  
205/9 205/25 214/8 215/2  
year [62] 11/6 11/20 13/16 14/20 22/13  
26/12 31/17 35/3 35/8 35/19 35/20  
35/22 39/1 39/3 40/14 41/17 45/24  
49/21 50/6 51/18 51/22 51/25 52/1  
52/2 52/4 58/10 68/7 76/17 76/18  
76/19 77/3 77/5 117/24 118/1 118/2  
119/1 119/5 129/22 182/9 182/15  
182/15 186/2 186/4 186/5 186/14  
187/10 188/10 189/6 189/7 189/7  
189/14 190/23 191/1 191/11 192/25  
193/15 193/16 193/21 194/10 196/20  
200/2 213/21  
year's [1] 11/18  
yearly [1] 13/15  
years [22] 6/17 6/19 11/11 18/17 33/4  
33/11 33/13 34/9 44/25 45/1 45/1  
45/10 76/15 86/11 118/4 134/10  
135/25 139/9 145/14 145/17 162/7  
204/12  
yes [242]  
yet [6] 15/9 15/11 19/13 177/2 209/11  
209/16  
you [1070]  
You'll [1] 157/20  
you're [82] 12/11 13/25 15/10 15/24  
22/10 23/24 26/19 33/2 34/6 34/6 43/9  
44/21 46/24 47/1 47/22 51/22 55/4  
63/3 63/9 63/10 70/9 73/1 76/11 78/25  
81/7 88/12 89/18 90/12 95/13 98/3  
100/1 100/16 102/9 105/10 105/15  
105/19 106/16 110/24 110/25 111/22  
112/25 113/6 113/7 121/18 121/21  
124/12 129/7 129/16 129/20 131/1  
140/6 144/6 146/25 149/11 152/23  
160/4 160/5 161/20 163/5 163/21  
166/8 175/5 175/6 175/23 177/20  
178/16 184/8 185/5 189/6 190/16  
191/2 191/6 192/7 192/16 193/22  
196/15 196/21 201/4 206/7 208/25  
211/14 217/7  
you've [11] 35/7 46/1 47/14 49/21 50/1  
50/1 51/18 148/21 175/12 175/22  
189/2  
Young [2] 21/20 21/20  
younger [1] 123/10  
your [86] 5/5 5/19 6/3 9/25 10/5 12/20  
13/19 14/2 14/6 15/19 20/23 24/12  
29/17 30/20 32/22 33/16 35/18 37/2  
37/12 37/21 40/23 41/23 42/20 43/16  
44/5 48/10 56/13 60/7 60/16 66/3  
72/17 73/13 78/6 86/12 96/21 97/10  
99/14 104/20 105/13 105/15 105/20  
112/13 121/6 127/9 127/11 130/14  
130/17 133/23 134/13 138/18 141/8  
152/7 152/9 155/13 157/19 157/25  
158/16 162/23 163/9 165/9 174/5  
175/8 179/25 185/22 186/7 188/17  
190/4 193/13 193/17 195/6 195/13  
196/6 197/8 200/18 200/19 200/20  
200/23 201/2 201/8 201/20 202/10  
203/23 205/5 206/11 212/25 213/21  
yours [1] 195/15  
youth [1] 123/11

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zero [2] 49/22 50/25

Zoom [1] 219/9

Position	Classification	Salary	benefits	Total Amount
Associate Superintendent	Removal	\$620,000.00	\$113,336.00	\$733,336.00
Chief of Academics	Repurpose	\$185,000.00	\$33,818.00	\$218,818.00
Executive Officer of Student Services to Executive Director of Student Services	Downgrade	\$27,789.00	\$5,079.82	\$32,868.82
Exec Ofcr Schools and Academics	Repurpose	\$140,000.00	\$25,592.00	\$165,592.00
Dir School Choice	Repurpose	\$115,886.35	\$21,184.02	\$137,070.37
Exec Ofcr HR Organizational Development	Removal	\$140,000.00	\$25,592.00	\$165,592.00
Executive Director of Charter Schools	Removal	\$147,344.90	\$26,934.65	\$174,279.55
Total		\$1,376,020.25	\$251,536.49	\$1,627,556.74
Position	Classification	Salary	benefits	Total Amount
Chief of Academic and Schools	Repurpose	\$185,000.00	\$33,818.00	\$218,818.00
Executive Director of School Support	Repurpose	\$126,000.00	\$23,032.00	\$149,032.00
Executive Officer of Divesity, Equity and Inclusion	Repurpose	\$145,000.00	\$26,506.00	\$171,506.00
Executive Director of Federal programs to Executive officer of State, local and Philanthropic investments	Upgrade	budgeted		
Total		\$456,000.00	\$83,356.00	\$539,356.00
Total savings				\$1,088,200.74